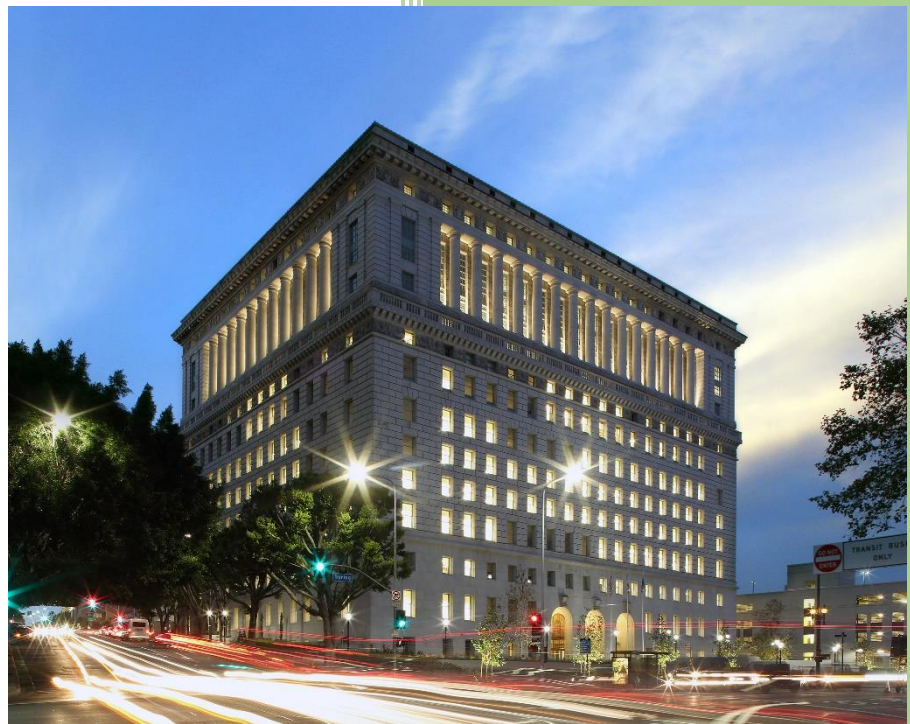


Los Angeles County Sheriff's Department

Audit and Accountability Bureau



PUBLIC COMMENTS AUDIT
PATROL OPERATIONS –
NORTH PATROL DIVISION –
PALMDALE SHERIFF'S STATION



Alex Villanueva, Sheriff

Project No. 2022-4-A

August 2, 2022

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
Audit and Accountability Bureau

PUBLIC COMMENTS AUDIT – PATROL OPERATIONS
NORTH PATROL DIVISION – PALMDALE SHERIFF'S STATION
Project No. 2022-4-A

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Public Comments Audit – Patrol Operations – North Patrol Division, Palmdale Sheriff's Station under the authority of the Sheriff of Los Angeles County. The audit was performed to determine how the Los Angeles County Sheriff's Department's (Department) Palmdale Sheriff's Station (Palmdale) adhered to the Manual of Policy and Procedures (MPP), Unit Orders, and the provisions of the United States Department of Justice (DOJ) Antelope Valley Settlement Agreement (AV Agreement)¹ regarding public comments, specifically service and personnel complaints documented on the Watch Commander Service Comment Report (SCR).²

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards.³ The AAB determined the evidence obtained was sufficient and appropriate to provide reasonable assurance of the results based on the audit objectives.

BACKGROUND

On April 28, 2015, the Department entered into the AV Agreement with the DOJ regarding police services in the Antelope Valley area which includes the cities of Lancaster and Palmdale, and the surrounding unincorporated Los Angeles County areas. In the AV Agreement, the Department agreed to ensure all public complaints are received, properly classified, and fully and fairly investigated.

The Department classifies public complaints into two categories: service complaints and personnel complaints.⁴ Service complaints are external communications of dissatisfaction with Department service, procedures or practices, response times, traffic citations, and those not involving employee misconduct. Personnel complaints are external allegations of misconduct against a Department member, either a violation of law or Department policy, to include but not limited to: discourtesy; dishonesty; unreasonable force; improper tactics; improper detention, search or arrest; neglect of duty; operation of vehicle; off-duty conduct; harassment; or discrimination.

¹ United States Department of Justice – Los Angeles County Sheriff's Department, Settlement Agreement Number CV 15-03174, April 2015.

² Manual of Policy and Procedures §3-04/010.05, Procedures for Department Service Reviews, December 2013.

³ United States Government Accountability Office, Government Auditing Standards, July 2018.

⁴ Manual of Policy and Procedures §3-04/010.00, Department Service Reviews, December 2013.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION

Project No. 2022-4-A

Public trust is vital to the Department’s mission and rests on the Department’s responsiveness to community needs and expectations. To foster public confidence in the Department and to promote constructive communication, public comments must be received with equal professional interest and courtesy, and given appropriate supervisory attention.⁵

PRIOR AUDITS

The AAB has conducted four prior public comments audits for Palmdale Sheriff’s Station.

METHODOLOGY

Scope

The audit encompassed seven main objectives and included an evaluation of completed SCR reviews from the Palmdale Sheriff’s Station to ensure compliance with the MPP, Unit Orders, Service Comment Report Handbook, and the AV Agreement. An SCR review was considered completed when approved and signed by the division commander.

- Objective No. 1 – Complaint Intake: To determine if personnel complaint forms and informational materials are made available to the public as required; if complaints made were accepted and reviewed; if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.
- Objective No. 2 – Complaint Classification: To determine if personnel complaints were not classified as service complaints; if complaints were appropriately classified; if allegations of misconduct were investigated.
- Objective No. 3 – Investigations: To determine if complaints were investigated thoroughly and by the appropriate/required individuals; if all persons at the scene giving rise to a misconduct allegation were identified; if interviews were performed, conducted separately, and recorded in their entirety.
- Objective No. 4 – Adjudication of a Service Comment Report: To determine whether the disposition of an SCR review was supported by sufficient information and relevant evidence.

⁵ Manual of Policy and Procedures §3-04/000.00, Personnel Investigations, April 1996.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION

Project No. 2022-4-A

- Objective No. 5 – Timeliness: To determine whether the SCR review was completed and forwarded to Division Headquarters within 30 days; if the SCR review was forwarded to the Discovery Unit within 60 days.
- Objective No. 6 – Accuracy of the SCR information in the Performance Recording and Monitoring System (PRMS): To determine whether the Result of Service Comment Review and the SCR information were entered accurately in PRMS.
- Objective No. 7 – Completion of Corrective Action: To determine if the personnel complaint disposition recommends corrective action, and if it was subsequently completed, and documented.

Auditors reviewed documentation comprised of completed SCR forms, Result of Service Comment Review forms, associated memoranda, correspondence, reports, audio and video recordings, and photographs. The SCR reviews were obtained from Palmdale Sheriff’s Station and Risk Management Bureau’s Discovery Unit. Additional documentation was obtained from Palmdale Sheriff’s Station.

In order to measure the Department’s compliance with the provisions of the AV Agreement, auditors conducted a qualitative assessment, as necessary, throughout the audit. This included an assessment of all available documentation for each SCR review to determine whether the complaints were received, appropriately classified, fully and fairly investigated up to the adjudication of the complaint in compliance with the applicable criteria. Finally, auditors verified accurate recording in the PRMS and that recommended corrective actions were completed.⁶

Audit Time Period

The audit time period was from July 1, 2021 through September 30, 2021.

⁶ AV Agreement, XI. Monitoring, B. Compliance Reviews and Audits, paragraph 149, April 2015, states compliance reviews and audits will contain both qualitative and quantitative elements as necessary for reliability and comprehensiveness.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION

Project No. 2022-4-A

Audit Population

All documented service and personnel complaints generated by the public against personnel from the Palmdale Sheriff’s Station, which were fully investigated with final approval by a commander at the division level, were included in the population. Twenty SCR reviews were identified from the data sources for the audit time period. Of the 20 SCR reviews, 17 were personnel complaints and three were service complaints. Three SCRs initiated at Palmdale during the audit time period were excluded from the population. Two were not completed by the fieldwork phase of the audit and one was forwarded to a custody facility which was responsible for conducting the review.

The SCR population was identified through the PRMS, Service Comment Module.⁷ The population was also cross referenced with entries in the Station/Bureau Administration Portal (SBAP).⁸ External commendations documented on SCR forms were not included in the audit.

Patrol station watch commanders are responsible for documenting in the Watch Commander’s Daily Log when a public complaint is received. This includes documenting anytime an SCR form is completed. The Watch Commander’s Daily Log is stored as an electronic record in the SBAP. Auditors reconciled this to the PRMS records.

All use of force incidents and civil claims used in Objective No. 2(c) were identified through the PRMS, Force Module and Claim Module. These items were cross referenced with entries in the SBAP.

Auditors identified varying populations to examine the different aspects of the seven main objectives, which are described in the Audit Details and Results Section of this report.

⁷ The PRMS provides systematic recording of data relevant to incidents involving uses of force, shootings, and commendations/complaints involving Department personnel. The Service Comment Module contains information on personnel and service complaints.

⁸ The SBAP is a data entry system designed to collect and track data related to risk management incidents at patrol stations. The system includes data on use of force, traffic collisions, public comments, pursuits, administrative investigations, and employee injuries and lawsuits/claims.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

AUDIT DETAILS AND RESULTS

Objective No. 1 – Complaint Intake

Objective No. 1(a) – Determine if personnel complaint forms and informational materials are made available to the public, as required.

Criteria

Manual of Policy and Procedures, Section 3-04/010.35, Public Accessibility to Information About the Complaint Process (October 2014), states:

Each Bureau, Station and facility shall maintain a supply of the Department forms SH-CR-596 and SH-CR-596A (Spanish version). These forms, entitled "Procedures For Public Complaints," explain how the Department conducts complaint inquiries...

Palmdale Sheriff’s Station Unit Order Number 14-06, Supplemental Supervisory Responsibilities, Community Complaints (June 2018), states:

Any Limited English Proficient (LEP) individual who wishes to file a complaint about a deputy or employee shall be provided with a complaint form and informational materials in the appropriate non-English language and/or be provided appropriate translation services in order to file a complaint.

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 124 (April 2015), states:

LASD shall continue to make personnel complaint forms and informational materials, including brochures and posters, available at appropriate County or municipal properties in the Antelope Valley, including, at a minimum, LASD stations, courts, county libraries, and LASD websites, and make them available to community groups upon request.

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

... Any Limited English Proficient (LEP) individual who wishes to file a complaint about a LASD deputy or employee shall be provided with a complaint form and

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

informational materials in the appropriate non-English language and/or be provided appropriate translation services in order to file a complaint.

Antelope Valley Settlement Agreement Compliance Metrics, Paragraph 124 and 125 (October 2019), Section 3C states:

3. *LASD will be deemed in substantial outcomes compliance when it:*

C. *Upon inspection, no more than one of the operable locations above fails to have any of the requisite complaint materials available.*

The unavailability of complaint material at a non-LASD facility will not be considered a failure if LASD has documented they have made reasonable efforts within 30 days preceding the inspection(s) to ensure complaint material was readily available at the location.

Procedures

On March 3, 2022 auditors visited Palmdale Station, Littlerock Library, Acton Agua Dulce Library, and the Department’s website to determine whether English and Spanish personnel complaint forms and informational materials and/or translation services were available to LEP individuals.

Results

All three sites and the Department website (100%) met the criteria for this objective. Each location and the Department website had the required forms and informational material.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 1(b) – Determine if complaints made through the dispatch center were accepted and reviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance...

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

LASD will continue to accept all personnel complaints, including anonymous and third-party complaints, for review and investigation. Complaints may be made in writing or verbally, in person or by mail, telephone (or TDD), facsimile, or electronic mail, as well as in the field...

Procedures

Auditors obtained and examined recorded inbound dispatch telephone call segments to determine whether incoming telephone call complaints were accepted. Auditors identified a total of 4,925 inbound station dispatch telephone call segments from the Voice Print International (VPI) system for the month of August 2021. A statistically valid random sample⁹ of 94 call segments was selected to determine whether all complaints were accepted and reviewed during their initiation.

Results

The 94 station telephone operator call segments reviewed did not result in any complaints.

⁹ Using a statistical one-tail test with a 95% confidence level and a 4% error rate, a statistically valid random sample was identified.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 1(c) – Determine if complaints made to the watch commander’s telephone line were accepted and reviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance...

Manual of Policy and Procedures, Section 3-09/010.05, Procedures for Department Service Reviews (December 2013), states:

...Department service reviews shall be documented on Service Comment Report forms. The Watch Commander of the Unit shall initiate a service review by immediately interviewing any member of the public who, whether in person or by telephone, offers a comment...

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

LASD will continue to accept all personnel complaints, including anonymous and third-party complaints, for review and investigation. Complaints may be made in writing or verbally, in person or by mail, telephone (or TDD), facsimile, or electronic mail, as well as in the field...

Procedures

When complainants call the Palmdale Sheriff’s Station, their initial point of contact is a station telephone operator or a dispatcher. Complaint calls are then forwarded to the watch commander. The watch commander’s line is a recorded telephone line.

Auditors identified a total of 304 inbound recorded watch commander telephone call segments from the VPI system for the month of August 2021. A statistically valid random sample of 73 call segments was selected to determine if complaints were made and accepted by the watch commander at the Palmdale Sheriff’s Station.

Of the 73 call segments, 67 were not complaints. The remaining six call segments were complaints, and were evaluated for this objective.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Results

Two (33%) of the six complaint calls met the criteria for this objective. The four remaining complaint calls contained comments from members of the public that should have resulted in the initiation of an SCR. Three calls should have been recorded as service complaints, while the remaining call should have been a personnel complaint.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 1(d) – Determine if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

Criteria

Palmdale Sheriff’s Station Unit Order Number 14-06, Supplemental Supervisory Responsibilities, Community Complaints (June 2018), states:

The refusal to accept a personnel complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, shall be grounds for discipline.

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 126 (April 2015), states:

The refusal to accept a personnel complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, shall be grounds for discipline, up to and including termination.

Procedures

Auditors evaluated 20 SCR reviews identified for the audit time period, including related source documentation and audio/video files, to determine whether a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

Of the 20 SCR reviews, four were received from sources other than Palmdale Sheriff’s Station and were excluded from this objective. Therefore, the remaining 16 SCR reviews were evaluated for this objective.

Results

All 16 (100%) SCRs met the criteria for this objective. All were submitted without indication of discouraging the complainant or providing false or misleading information about filing of the complaint.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

The table below summarizes the filing locations for all the SCR reviews.

Table No. 1 – Complaint Filing Location

Complaint Received By	Number of SCRs
Palmdale Sheriff’s Station	16
Website/Fax/Email at Internal Affairs Bureau	4
TOTAL	20

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 2 – Complaint Classification

Objective No. 2(a) – Determine if personnel complaints were misclassified as service complaints.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance...

- *Service Complaint: an external communication of dissatisfaction with Department service, procedure or practice, not involving employee misconduct; and*
- *Personnel Complaint: an external allegation of misconduct, either a violation of law or Department policy, against any member of the Department.*

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 128 (April 2015), states:

LASD will ensure that personnel complaints are not misclassified as service complaints.

Antelope Valley Settlement Agreement Compliance Metrics, Paragraph 128, 130, 131 (partial) & 140 (partial), (October 2019), Section 3B states:

3. *LASD will be deemed in substantial outcomes compliance when:*

- B. At least 95% of public complaints are classified properly as a service and/or personnel complaint at intake, resolution, and adjudication, or corrected during the management review.*

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to ensure they were properly classified as service complaints. Seventeen of the SCR reviews were excluded from this objective because they were personnel complaints. Therefore, auditors evaluated three service complaint SCR reviews for this objective.

Results

All three (100%) service SCRs reviewed met the criteria for this objective. All of the SCRs were appropriately classified as service complaints.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 2(b) – Determine whether Service Comment Reports were appropriately classified.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

The Watch Commander shall place a mark in the appropriate box indicating the nature of the comment, and shall mark the appropriate sub-category(s) as accurately as possible.

Manual of Policy and Procedures, Section 3-04/010.25, Personnel Complaints (October 2014), states:

The Watch Commander shall also check the fact page of the Service Comment form and ensure that it is filled out completely and correctly. He shall confirm that the proper categories are marked reflecting the nature of the complaint...

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 130 (April 2015), states:

Antelope Valley unit commanders shall be responsible for appropriately classifying each allegation and personnel complaint raised at the outset or during the investigation/review of a complaint...

Procedures

Auditors evaluated the 20 SCR reviews, including their related source materials to determine whether the complaints were appropriately classified during the initial intake, or were later modified to reflect the correct classification.

Results

All 20 (100%) SCRs met the criteria for this objective.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 2(c) – Determine if all allegations of misconduct were investigated.

Criteria

Palmdale Sheriff’s Station Unit Order Number 14-06, Supplemental Supervisory Responsibilities (June 2018), Community Complaints, states:

Supervisors shall ensure that all allegations of personnel misconduct are documented and are fully and fairly investigated...

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 130 (April 2015), states:

... LASD shall investigate every allegation of misconduct that arises during an investigation even if an allegation is not specifically articulated as such by the complainant.

Procedures

Auditors identified and reviewed 59 use of force incidents that occurred during the audit time period. In addition, five civil claims and three lawsuits were filed during the audit time period and were reviewed. Auditors determined whether allegations of misconduct were present and, if so, that they were documented on an SCR and investigated.

Of the 67 use of force incidents, civil claims and lawsuits claims reviewed, 53 did not contain allegations of misconduct. Therefore, the remaining 14 were evaluated for this objective.

Results

One (7%) of the 14 incidents met the criteria for this objective. Thirteen of the fourteen incidents had allegations which were not documented on an SCR and not investigated.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3 – Complaint Investigations

Objective No. 3(a) – Determine if all investigations of personnel complaints were thorough as necessary to reach reliable, objective and complete findings.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 131 (April 2015), states:

All investigations of Antelope Valley personnel complaints, including reviews, shall be as thorough as necessary to reach reliable and complete findings. In each investigation, LASD shall consider all relevant evidence, including circumstantial, direct and physical evidence, as appropriate, and make credibility determinations based upon that evidence. There will be no automatic preference for a deputy’s statement over a non-deputy’s statement, nor will LASD disregard a witness’ statement merely because the witness has some connection to the complainant or because of any criminal history. LASD shall make efforts to resolve material inconsistencies between witness statements.

Procedures

Auditors examined the 20 SCR reviews to determine whether the complaints were thoroughly investigated. Three of the SCR reviews were excluded from this objective because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Auditors reviewed source documentation narratives, interviews, correspondence, and audio/video files. Auditors conducted a qualitative assessment of those documents to determine if supervisors documented and considered all relevant evidence as appropriate. This included determining whether or not all potential parties were contacted, interviews were recorded, and all involved Department personnel were identified and interviewed.

Results

All 17 (100%) personnel SCR reviews met the criteria for this objective. All investigations of personnel complaints were thorough as necessary.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(b) – Determine if alleged incidents of misconduct were referred to the Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB).

Criteria

Manual of Policy and Procedures, Section 3-04/010.25, Personnel Complaints (October 2014), states:

The concerned Unit Commander is responsible for evaluating each personnel complaint to determine the appropriate supervisory response. The nature and seriousness of the allegation(s), the potential for employee discipline, and the concerned employee’s performance history are potential factors to consider in the evaluation. Generally, the following courses of action are options:

- *request that ICIB conduct a criminal investigation if there is reason to believe a crime has been committed...*
- *request that IAB conduct an administrative investigation...*
- *conduct a Unit level administrative investigation; and*
- *initiate a service review.*

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 132 (April 2015), states:

LASD agrees to continue to require station commanders in the Antelope Valley to refer alleged incidents of misconduct to the IAB or ICIB for further investigation or review...

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials to determine whether complaints requiring referral to IAB or ICIB were referred. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Of the 17 personnel SCR reviews, one SCR review was required to be referred to IAB.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Results

The one (0%) incident did not meet the criteria for this objective. This allegation was not referred to IAB. This SCR review recommended further investigation; however, any further investigation was not documented.¹⁰

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¹⁰ Palmdale management stated that this incident was subsequently included with a separate allegation of misconduct and investigated together. The investigation is currently ongoing.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3 (c) – Determine if the Division Chief reviewed the matter with the unit commander of Internal Affairs Bureau if the case proceeded criminally.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 132 (April 2015), states:

... If the case proceeds criminally, the Division Chief over the Antelope Valley will review the matter with the unit commander of IAB to determine whether the administrative investigation may proceed on a parallel track. The Division Chief or unit commander of IAB may consult with the prosecuting agency for its input. If the matter proceeds on a parallel track, any compelled interview of the subject deputies may be delayed. The Division Chief shall document the reasons for the decision.

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to determine if the case proceeded criminally, and whether the Division Chief reviewed the matter with the unit commander of IAB.

Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective. Of the 17 personnel SCR reviews, none were evaluated for this objective because none proceeded criminally.

Results

None were applicable for this objective.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(d) – Determine if an involved supervisor, or any supervisor who authorized the conduct that led to the personnel complaint, did not conduct the complaint investigation.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 133 (April 2015), states:

LASD will not permit any involved supervisor, or any supervisor who authorized the conduct that led to the complaint, to conduct a complaint investigation.

Procedures

Auditors evaluated the 20 SCR reviews, including their related source materials, to determine whether the supervisor who conducted the SCR investigation was not an involved supervisor or any supervisor who authorized the conduct that led to the complaint unless sufficient justification was documented in the SCR investigation.

Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

All 17 (100%) applicable SCR reviews met the criteria for this objective. A supervisor, that was not involved and did not authorize the conduct that led to the personnel complaint conducted the investigation.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(e) – Determine if all persons at the scene giving rise to a misconduct allegation were identified.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 134 (April 2015), states:

The misconduct investigator shall seek to identify all persons at the scene giving rise to a misconduct allegation, including all LASD deputies. The investigator shall note in the investigative report the identities of all deputies and other witnesses who were on the scene but assert they did not witness and were not involved in the incident...

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to ensure all persons at the scene giving rise to a misconduct allegation were identified.

Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

Sixteen (94%) of the 17 personnel SCR reviews met the criteria for this objective. One SCR review did not identify all persons at the scene giving rise to the misconduct allegation.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(f) – Determine if the complainant, involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

The Watch Commander of the Unit shall initiate a service review by immediately interviewing any member of the public who, whether in person or by telephone, offers a comment.

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 135 (April 2015), states:

All witnesses, including deputies witnessing or involved in an incident that becomes the subject of a personnel complaint, shall provide a written statement regarding the incident or be interviewed ...

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 136 (April 2015), states:

The SCR complaint investigator shall interview each complainant in person, if practical...

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to determine whether the complainants, the involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

Sixteen (94%) of the 17 personnel SCR reviews met the criteria for this objective. The incident associated with this SCR included five employees who were on-scene during the incident who did not provide written statements and were not interviewed.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(g) – Determine if the complainant and non-deputy witness interviews were recorded in their entirety.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

During telephonic comments or complaints, the Watch Commander shall field the call on a taped line if equipment is in place to do so ...

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 136 (April 2015), states:

... Interviews shall be recorded in their entirety, absent documented extraordinary circumstances.

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether existing complainant and witness (non-deputy) interviews were recorded in their entirety, absent documented extraordinary circumstances. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

All 17 (100%) personnel SCR reviews met the criteria for this objective.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(h) – Determine if complainant, involved employee, and all witness (including deputy) interviews were conducted separately.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 137 (April 2015), states:

Consistent with current policy, interviews shall be conducted separately...

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether the complainants, the involved employee, and all witness (including deputy) interviews were conducted separately. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

Fifteen (88%) of the 17 SCR reviews met the criteria for this objective. Two SCR reviews did not document whether the involved employees were interviewed separately.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(i) – Determine if interpreters used for Limited English Proficient (LEP) complainants or witnesses were not party to the complaint, if applicable.

Criteria

Palmdale Sheriff’s Station Unit Order Number 14-06, Community Complaints (June 2018), Accepting Complaints, states:

Any Limited English Proficient (LEP) individual who wishes to file a complaint about a deputy or employee shall be provided with...appropriate translation services...

Manual of Policy and Procedures, Section 3-09/004.00, Limited English Proficiency and Language Assistance Plan (April 2018), states:

Department members shall take reasonable steps to ensure effective and accurate communication with a LEP individual when providing assistance or Department programs and services. Personnel will use qualified bilingual persons as translators and interpreters as set forth in this policy...

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 137 (April 2015), states:

... An interpreter not involved in the underlying complaint will be used when taking statements or conducting interviews of any LEP complainant or witness.

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether interpreters used for LEP complainants or witnesses were party to the complaint.

Results

None of the complainants or witnesses in the 20 SCR reviews required an LEP interpreter.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 4 – Adjudication of the Service Comment Report – Determine if the disposition of the Service Comment Report review was supported by sufficient information and relevant evidence.

Criteria

Service Comment Report Handbook, Section III, Adjudication of an SCR (June 2011), states:

*...Service reviews should be concise yet need to include sufficient information in order for the **Unit Commander** to make an appropriate assessment. The review should be objective and each allegation should be thoroughly addressed. During the adjudication stage, it is the responsibility of the Unit Commander to ensure that the recommended disposition is supported by the statements and evidence...*

C. Adjudication of an SCR:

*If the complaint is handled as a service review, then the **Unit Commander** is responsible for approving the recommended review disposition. The service review must contain sufficient information in order for the Unit Commander to make a final determination and that determination must be supported by the information contained in the review...*

*The **Unit Commander** should use neutral and objective criteria, weigh evidence appropriately to distinguish strong evidence from questionable or less material evidence, and not indulge in presumptions that bias the findings...*

E. Directions for Completing the “Result of Service Comment Review” Form:

2). **REVIEW DISPOSITION:**

c). **Review Comp - Service Only - No Further Action:**

(Used only when a complaint is categorized as a “Service Complaint.”)...

d). **Employee Conduct Appears Reasonable:** *(Review indicated the employee’s actions appear to be in compliance with procedures, policies, guidelines or training.)...*

e). **Appears Employee Conduct Could Have Been Better:** *(The employee’s actions were in compliance with procedures, policies, and guidelines. The complaint could have been minimized if the employee had employed tactical communication principles or common sense.)...*

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

- f). **Employee Conduct Should Have Been Different:** *(The employee’s actions were not in compliance with established procedures, policies, guidelines or training. Watch Commander will take appropriate action.)...*
- g). **Unable to Make a Determination:** *(The review revealed insufficient information to assess the employee’s alleged conduct or to identify the employees involved.)...*
- h). **Resolved - Conflict Resolution Meeting:** *(A conflict resolution meeting with the reporting party and involved employee(s) was held. The meeting adequately addressed all concerns and no further actions are deemed necessary.)...*

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 131 (April 2015), states:

...There will be no automatic preference for a deputy’s statement over a non-deputy’s statement, nor will LASD disregard a witness’ statement merely because the witness has some connection to the complainant or because of any criminal history. LASD shall make efforts to resolve material inconsistencies between witness statements.

Antelope Valley Settlement Agreement, Subsection E, Personnel Complaint Audits, paragraph 140 (April 2015), states:

LASD shall conduct a semiannual, randomized audit of LASD-AV’s complaint intake, classification, and investigations. This audit will assess whether complaints are accepted and classified consistent with policy, investigations are complete, and complaint dispositions are consistent with a preponderance of the evidence.

Procedures

The adjudication of an SCR is documented on the *Result of Service Comment Review* form and is evidenced by the Unit Commander’s signature attesting he/she agreed with the recommended disposition made by the supervisor completing the investigation. Auditors examined the SCR reviews to determine whether the disposition was supported by sufficient information and relevant evidence contained in the review. This included assessing whether automatic preference for a deputy’s statement was given over a non-deputy’s statement.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Results

Twenty-nine (91%) of the 32 SCR dispositions met the criteria for this objective. Three SCR dispositions were not supported by sufficient information and related evidence. Employees who were present during the incident were neither interviewed nor provided a written statement.

Table No. 2 represents the dispositions for the SCRs reviewed. The number of dispositions does not equal the number of SCRs in the audit period because multiple Department members may have been involved in a single complaint requiring a separate disposition for each Department member.

Table No. 2 - Result of Service Comment Review

Review Disposition	Number of Dispositions
Review Completed – Service Only	3
Employee Conduct Appears Reasonable	19
Appears Employee Conduct Could Have Been Better	4
Employee Conduct Should Have Been Different	5
Unable to Make a Determination	1
Resolved – Conflict Resolution Meeting	0
Unit Level Administrative Investigation Initiated	0
Exoneration	0

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 5 – Timeliness

Objective No. 5(a) – Determine if the Service Comment Report review was completed within 30 days and forwarded to Division.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

NOTE:

Watch Commander Service Comment Reports shall be completed within 30 calendar days...

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

Service reviews shall be completed within 30 calendar days...

Procedures

Auditors examined the 20 SCR reviews for their complaint intake dates and the dates the unit commander signed the SCR reviews, including the dates Division Headquarters time stamped the received SCR review. Auditors determined whether the SCR reviews were completed within 30 calendar days and forwarded to Division Headquarters.

Results

None (0%) of the 20 SCR reviews met the criteria for this objective.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

The table below summarizes the duration for the SCR reviews to be completed at the unit level.

Table No. 3 - Timely Completion of the SCR Reviews

Number of Days for SCR review to be completed	
0-30 Days	0
31-40 Days	1
41-50 Days	2
51-60 Days	4
61-70 Days	2
71-80 Days	4
81-90 Days	3
91+ Days	4
TOTAL	20

This space intentionally left blank.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 5(b) – Determine if the Service Comment Report review was forwarded to the Discovery Unit within 60 days.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

...Unit Commanders shall ensure that the Service Comment Report is completed and forwarded to the Discovery Unit within 60 days of receipt of the initial complaint.

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

The completed SCR package shall be forwarded to the Discovery Unit within 60 calendar days...

Procedures

Auditors examined the 20 SCR reviews for their complaint intake dates and PRMS for the Discovery Unit’s received date to determine whether the SCR review was forwarded to the Discovery Unit within 60 days.

Results

One (5%) of the 20 SCR reviews met the criteria for this objective. The remaining 19 SCRs did not document any delays that prevented the timely completion and submission to the Division Headquarters.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

The table below summarizes the duration for the SCR reviews to be forwarded to division headquarters.

Table No. 4 – SCR Reviews Forwarded to Division Headquarters

Number of Days for SCR review to be forwarded to Division	
0-60 Days	1
61-70 Days	1
71-80 Days	3
81-90 Days	2
91-100 Days	4
101-110 Days	3
111-120 Days	1
121+ Days	5
TOTAL	20

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 6 – Accuracy of the Service Comment Report Data

Objective No. 6(a) – Determine if the Result of Service Comment Review information was entered accurately in the Performance Recording and Monitoring System.

Criteria

Service Comment Report Handbook, Section III, Adjudication of an SCR, (June 2011), states:

*...Service reviews should be concise yet need to include sufficient information in order for the **Unit Commander** to make an appropriate assessment. The review should be objective and each allegation should be thoroughly addressed. During the adjudication stage, it is the responsibility of the Unit Commander to ensure that the recommended disposition is supported by the statements and evidence.*

*In addition to the **Unit Commander** and **Division Chief/Commander**, independent reviewers have access to service reviews in order to assess our thoroughness and fairness.*

Service Comment Report Handbook, Section III, Subsection B, Result of Service Review (June 2011), states:

*Upon completion of a service review about a public personnel complaint, the **Unit Commander** shall ensure that the “Result of Service Comment Review” form is completed (MPP 3-04/010.25-Personnel Complaints, revised 01/05/03).*

Procedures

Auditors examined the 20 SCR reviews and their related entries in PRMS to determine whether the information on the Result of Service Comment Review form was accurately entered in PRMS. At the completion of audit field work, two SCR reviews had not been entered into PRMS.

Results

All eighteen (100%) SCR reviews met the criteria for this objective. The information on the Result of Service Comment Review information was accurately entered in the PRMS.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 6(b) – Determine if the Service Comment Report information was entered accurately in the Performance Recording and Monitoring System.

Criteria

Antelope Valley Settlement Agreement, Subsection A, Personnel Performance Index, paragraph 142 (April 2015), states:

LASD-AV will ensure that PPI [now PRMS] data is accurate and hold responsible Antelope Valley personnel accountable for inaccuracies in any data entered.

Procedures

Auditors examined the 20 SCR reviews and their entries in PRMS to determine whether information was accurately entered in PRMS. At the completion of field work for the audit, two of the SCR reviews had not yet been entered into PRMS.

Results

All eighteen (100%) SCR reviews met the criteria for this objective. The Service Comment Review information was accurately entered in the PRMS.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 7 – Completion of Corrective Action

Objective No. 7 – Determine if the personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.

Criteria

Service Comment Report Handbook, Section II, Conducting the “Service Review” of Complaint, Subsection H, Personnel Complaint Dispositions (April 2009), states:

Appears Employee Conduct Could Have Been Better...This disposition will generally result in corrective action, which may include verbal or documented counseling (Unit Performance Log entry), training, etc.

Service Comment Report Handbook, Section II, Conducting the “Service Review” of Complaint, Subsection H, Personnel Complaint Dispositions (April 2009), states:

Employee Conduct Should Have Been Different....This disposition will generally result in documented counseling (Unit Performance Log entry) or an appropriate level of corrective action.

Procedures

The disposition of an SCR is documented on the *Result of Service Comment Review* form and is evidenced by the Unit Commander’s signature approving the recommended disposition made by the supervisor completing the investigation.

Auditors examined the dispositions of the 17 personnel SCR reviews to determine whether the disposition was “Appears Employee Conduct Could Have Been Better” or “Employee Conduct Should Have Been Different”.

Of the 17 personnel SCRs, eight resulted in dispositions of either “Appears Employee Conduct Could Have Been Better” or “Employee Conduct Should Have Been Different”. Therefore, eight dispositions were evaluated for this objective.

Results

Five (63%) of the eight SCRs met the criteria for this objective. The remaining three SCRs contained recommendations for corrective action, but did not document that the corrective action was actually administered.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

SUMMARY OF AUDIT RESULTS

The audit yielded the following results:

Table No. 5 - Summary of Audit Results

Objective No.	Audit Objectives	Met the Criteria	
1	COMPLAINT INTAKE	2022	2021
1(a)	<i>Determine if personnel complaint forms and informational materials are made available to the public, as required.</i>	100%	100%
1(b)	<i>Determine if complaints made through the dispatch center were accepted and reviewed.</i>	Not Applicable	Not Applicable
1(c)	<i>Determine if complaints made to the watch commander’s telephone line were accepted and reviewed.</i>	33%	Not Applicable
1(d)	<i>Determine if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.</i>	100%	100%
2	COMPLAINT CLASSIFICATION		
2(a)	<i>Determine if personnel complaints were misclassified as service complaints.</i>	100%	100%
2(b)	<i>Determine whether Service Comment Reports were appropriately classified.</i>	100%	100%
2(c)	<i>Determine if all allegations of misconduct were investigated.</i>	7%	100%
3	INVESTIGATIONS		
3(a)	<i>Determine if all investigations of personnel complaints were thorough as necessary to reach reliable, objective and complete findings.</i>	100%	100%
3(b)	<i>Determine if alleged incidents of misconduct were referred to the Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB).</i>	0%	Not Applicable
3(c)	<i>Determine if the Division Chief reviewed the matter with the unit commander of Internal Affairs Bureau if the case proceeded criminally.</i>	Not Applicable	Not Applicable
3(d)	<i>Determine if an involved supervisor, or any supervisor who authorized the conduct that led to the personnel complaint, did not conduct the complaint investigation.</i>	100%	100%
3(e)	<i>Determine if all persons at the scene giving rise to a misconduct allegation were identified.</i>	94%	100%
3(f)	<i>Determine if the complainant, involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.</i>	94%	100%
3(g)	<i>Determine if the complainant and non-deputy witness interviews were recorded in their entirety.</i>	100%	95%
3(h)	<i>Determine if complainant, involved employee, and all witness (including deputy) interviews were conducted separately.</i>	88%	95%
3(i)	<i>Determine if interpreters used for Limited English Proficient (LEP) complainants or witnesses were not party to the complaint, if applicable.</i>	Not Applicable	Not Applicable
4	ADJUDICATION OF A SERVICE COMMENT REPORT		
	<i>Adjudication of the Service Comment Report – Determine if the disposition of the Service Comment Report review was supported by sufficient information and relevant evidence.</i>	91%	100%
5	TIMELINESS		
5(a)	<i>Determine if the Service Comment Report review was completed within 30 days and forwarded to Division.</i>	0%	14%

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No.	Audit Objectives	Met the Criteria	
5(b)	<i>Determine if the Service Comment Report review was forwarded to the Discovery Unit within 60 days.</i>	5%	33%
6	ACCURACY OF SCR REVIEW INFORMATION IN PRMS		
6(a)	<i>Determine if the Result of Service Comment Review information was entered accurately in the Performance Recording and Monitoring System.</i>	100%	Not Evaluated
6(b)	<i>Determine if the Service Comment Report information was entered accurately in the Performance Recording and Monitoring System.</i>	100%	100%
7	COMPLETION OF CORRECTIVE ACTION		
	<i>Determine if the personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.</i>	63%	Not Evaluated

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

OTHER RELATED MATTERS

Service Comment Report Training

Palmdale Station SCR training is conducted on an on-the-job basis once personnel are assigned to the Watch Commander post. Personnel expressed a concern that there is little clarity in what statements constitute comments that need to be documented in SCRs. Formalized training may reduce the likelihood that disparate interpretations of the SCR policies and procedures are made.

Documentation of the Date Discovery Unit Received the SCR Review

Auditors noted that the “Received at Discovery Unit by” section on the “Result of Service Comment Review” form was consistently incomplete. In order to obtain the date that Discovery Unit received the SCR review, auditors had to locate this information in PRMS. Therefore, every effort should be made to ensure that Discovery Unit properly documents the receipt of the completed SCR reviews to verify that documents were properly forwarded on a timely basis. This issue has been noted on a prior audit.

Recommendations and Corrective Actions

Auditors noted that the Watch Commander Memorandums contain sections with the following titles:

- Recommended Findings;
- Recommended Review Disposition;
- and Recommendation(s).

Auditors noted that Watch Commanders have included recommendations in these differing areas of the memorandums. This has created the risk that recommendations are missed and/or are in conflict with each other.

Furthermore, auditors noted that there is no place for watch commanders to document any administered corrective actions. The Service Comment Report Handbook recommends that watch commanders administer corrective action when warranted. In an effort to enhance accountability, the SCR form should allow for watch commanders to document corrective actions in a consistent manner.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

CONCLUSION

The AAB auditors performed analyses and made assessments to identify areas that needed improvement. The AAB considers the results of this audit to be a helpful management tool for all Department personnel. The evidence presented provides reasonable assurance that Department personnel are not adhering to all of the audited provisions in the AV Agreement as identified in the above-mentioned criteria.

RECOMMENDATIONS

When Departmental policies and procedures and the AV Agreement are not adhered to, it may result in an increased risk for an inability to be compliant. Department management should disseminate the results of this audit to its personnel. Additionally, as best practice, Department management is encouraged to conduct recurring and ongoing briefing of policies and procedures. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

1. It is recommended the Department formalize the Service Comment Report training. Auditors noted that Palmdale management learns the SCR process primarily through on-the-job experience when they are assigned as Watch Commanders. Formal training may limit the risk that management apply SCR policies and procedures in a disparate manner. (All Objectives)
2. It is recommended Palmdale Sheriff’s Station conduct recurring and ongoing briefings to personnel on Unit Order No. 14-06 to ensure that all allegations of misconduct are documented on an SCR and investigated. An emphasis should be placed on allegations made during civil claim and lawsuit investigations. (Objective No. 2)
3. It is recommended the Department evaluate whether the current SCR Timeline – Summary of Due Dates in the SCR Handbook are feasible for SCR Reviews. (Objective No. 5)
4. Based on Department practice of corrective action resulting from a disposition of “Appears Employee Conduct Could Have Been Better” or “Employee Conduct Should Have Been Different,” it is recommended that the Service Comment Report Handbook, Section III, Subsection E(2), Directions for Completing the “Result of Service Comment Review” Form, be revised to require that corrective action be administered and documented in a consistent manner. (Objective No. 7).

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

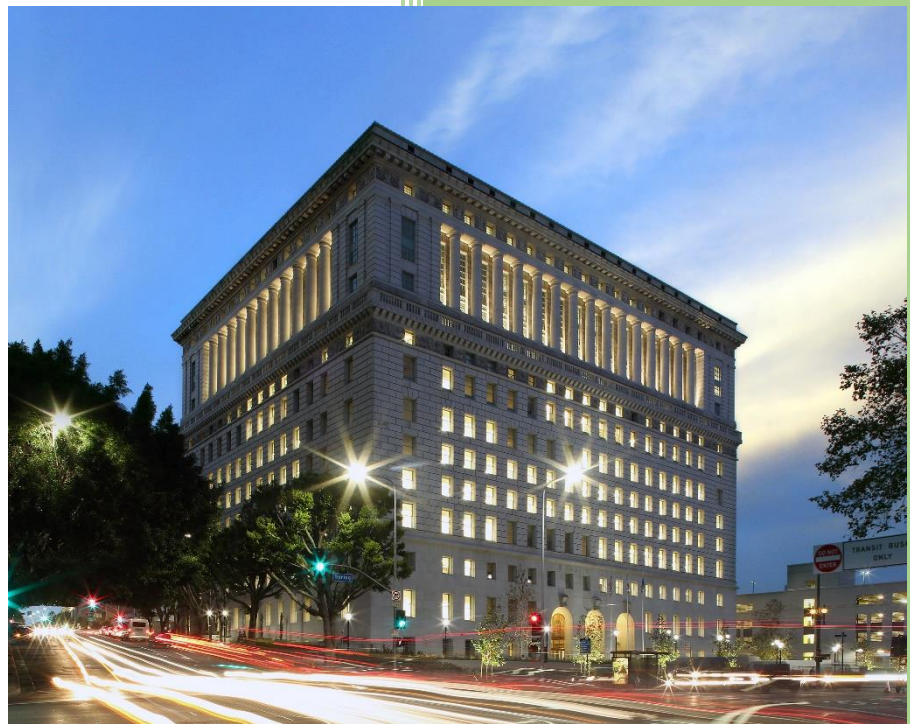
Views of Responsible Officials

On July 27, 2022, the North Patrol Division command staff submitted a formal response to the AAB concurring with the audit results.

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Los Angeles County Sheriff's Department

Audit and Accountability Bureau



PUBLIC COMMENTS AUDIT
PATROL OPERATIONS –
NORTH PATROL DIVISION –
PALMDALE SHERIFF'S STATION



Alex Villanueva, Sheriff

Project No. 2022-4-A

August 2, 2022

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: August 2, 2022

FILE NO: 2022-4-A

OFFICE CORRESPONDENCE

FROM: 
RICHARD L. HIRSCH, ACTING CAPTAIN
AUDIT AND ACCOUNTABILITY BUREAU

TO: TIMOTHY K. MURAKAMI
UNDERSHERIFF

SUBJECT: EXECUTIVE SUMMARY – PUBLIC COMMENTS AUDIT – PATROL OPERATIONS – NORTH PATROL DIVISION – PALMDALE SHERIFF'S STATION

The Audit and Accountability Bureau (AAB) conducted the Public Comments Audit – Patrol Operations – North Patrol Division, Palmdale Sheriff's Station under the authority of the Sheriff of Los Angeles County. The audit was performed to determine how the Los Angeles County Sheriff's Department's (Department) Palmdale Sheriff's Station (Palmdale) adhered to the Manual of Policy and Procedures (MPP), Unit Orders, and the provisions of the United States Department of Justice (DOJ) Antelope Valley Settlement Agreement (AV Agreement) regarding public comments, specifically service and personnel complaints documented on the Watch Commander Service Comment Report (SCR).

The audit encompassed seven main objectives and included an evaluation of completed SCR reviews from the Palmdale Sheriff's Station to ensure compliance with the MPP, Unit Orders, Service Comment Report Handbook, and the AV Agreement. An SCR review was considered completed when approved and signed by the division commander.

The management and staff at the Palmdale Sheriff's Station were accommodating and cooperative in providing the necessary information for the audit. A summary of the audit results can be found on the following page.

Summary of Audit Results

Objective No.	Audit Objectives	Met the Criteria	
		2022	2021
1	COMPLAINT INTAKE		
1(a)	Determine if personnel complaint forms and informational materials are made available to the public, as required.	100%	100%
1(b)	Determine if complaints made through the dispatch center were accepted and reviewed.	Not Applicable	Not Applicable
1(c)	Determine if complaints made to the watch commander's telephone line were accepted and reviewed.	33%	Not Applicable
1(d)	Determine if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.	100%	100%
2	COMPLAINT CLASSIFICATION		
2(a)	Determine if personnel complaints were misclassified as service complaints.	100%	100%
2(b)	Determine whether Service Comment Reports were appropriately classified.	100%	100%
2(c)	Determine if all allegations of misconduct were investigated.	7%	100%
3	INVESTIGATIONS		
3(a)	Determine if all investigations of personnel complaints were thorough as necessary to reach reliable, objective and complete findings.	100%	100%
3(b)	Determine if alleged incidents of misconduct were referred to the Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB).	0%	Not Applicable
3(c)	Determine if the Division Chief reviewed the matter with the unit commander of Internal Affairs Bureau if the case proceeded criminally.	Not Applicable	Not Applicable
3(d)	Determine if an involved supervisor, or any supervisor who authorized the conduct that led to the personnel complaint, did not conduct the complaint investigation.	100%	100%
3(e)	Determine if all persons at the scene giving rise to a misconduct allegation were identified.	94%	100%
3(f)	Determine if the complainant, involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.	94%	100%
3(g)	Determine if the complainant and non-deputy witness interviews were recorded in their entirety.	100%	95%
3(h)	Determine if complainant, involved employee, and all witness (including deputy) interviews were conducted separately.	88%	95%
3(i)	Determine if interpreters used for Limited English Proficient (LEP) complainants or witnesses were not party to the complaint, if applicable.	Not Applicable	Not Applicable
4	ADJUDICATION OF A SERVICE COMMENT REPORT		
	Adjudication of the Service Comment Report – Determine if the disposition of the Service Comment Report review was supported by sufficient information and relevant evidence.	91%	100%
5	TIMELINESS		
5(a)	Determine if the Service Comment Report review was completed within 30 days and forwarded to Division.	0%	14%

Objective No.	Audit Objectives	Met the Criteria	
5(b)	<i>Determine if the Service Comment Report review was forwarded to the Discovery Unit within 60 days.</i>	5%	33%
6	ACCURACY OF SCR REVIEW INFORMATION IN PRMS		
6(a)	<i>Determine if the Result of Service Comment Review information was entered accurately in the Performance Recording and Monitoring System.</i>	100%	Not Evaluated
6(b)	<i>Determine if the Service Comment Report information was entered accurately in the Performance Recording and Monitoring System.</i>	100%	100%
7	COMPLETION OF CORRECTIVE ACTION		
	<i>Determine if the personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.</i>	63%	Not Evaluated

On July 27, 2022, the North Patrol Division submitted a formal response to AAB concurring with the audit results. A copy of the audit was provided to the Office of Inspector General.

Should you have any questions or require additional information, please contact me at (323) 307-8302.

RLH:KD:kd

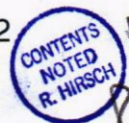
Attachments:

- Response Memorandum from the North Patrol Division
- Audit Report – Public Comments Audit, Patrol Operations, North Patrol Division, Palmdale Sheriff’s Station, Project No. 2022-4-A

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: July 27, 2022

FILE NO:

OFFICE CORRESPONDENCE**FROM:**

Dennis M. Kneer
 DENNIS M. KNEER, CHIEF
 NORTH PATROL DIVISION

TO: RICHARD L. HIRSCH, A/CAPTAIN
 AUDIT AND ACCOUNTABILITY
 BUREAU

**SUBJECT: PUBLIC COMMENTS AUDIT – PALMDALE STATION
 PROJECT NO. 2022-4-A**

Audit and Accountability Bureau (AAB) conducted an audit regarding the detention of individuals and data collection for Palmdale Station, which covered the period of July 1, 2021 to September 30, 2021. The purpose of the audit was to determine how Palmdale Station adhered to the Manual of Policy and Procedures (MPP), Unit Orders, and the provisions of the United States Department of Justice (DOJ) Antelope Valley Settlement Agreement (AV Agreement) regarding public comments, specifically service and personnel complaints documented on the Watch Commander Service Comment Report (SCR).

A summary of the audit results revealed ten (10) areas for improvement:

Obj. #	Audit Objective	%
1c	Complaints made to WC line were accepted and reviewed	33
2c	Allegations of misconduct were investigated	7
3b	Alleged incidents of misconduct were referred to IAB or ICIB	0
3e	Persons at the scene giving rise to a misconduct allegation were identified	94
3f	Complainant, involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.	94
3h	Complainant, involved employee, and all witness (including deputy) interviews were conducted separately.	88
4	Disposition of the SCR review was supported by sufficient information and relevant evidence.	91



5a	SCR review was completed within 30 days and forwarded to Division	0
Obj. #	Audit Objective	%
5b	SCR review was forwarded to the Discovery Unit within 60 days (from NPD)	5
7	Personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.	63

Please contact me at (213) 229-3020 if you have questions regarding this matter.

DMK:RSL:rl

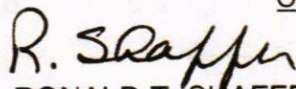
COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: June 21, 2022

FILE NO:

OFFICE CORRESPONDENCE

FROM:



 RONALD T. SHAFFER, CAPTAIN
 PALMDALE STATION

 TO: DENNIS M. KNEER, CHIEF
 NORTH PATROL DIVISION

**SUBJECT: PUBLIC COMMENTS AUDIT – PALMDALE STATION
 PROJECT NO. 2022-4-A**

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A summary of the audit results revealed ten (10) areas for improvement:

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3b	Alleged incidents of misconduct were referred to IAB or ICIB	0
3e	Persons at the scene giving rise to a misconduct allegation were identified	94
3f	Complainant, involved employees, and witnesses (including deputies) provide statement of the incident or were interviewed	
3h	Complainant, involved employee, and (including deputy) interviews were conducted separately.	
4	Disposition of the SCR review was supported by sufficient information and relevant evidence	
5a	SCR review was completed within 30 days and forwarded to Division	

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JUL 27 2022

NORTH PATROL DIVISION

Obj. #	Audit Objective	%
5b	SCR review was forwarded to the Discovery Unit within 60 days (from NPD)	5
7	Personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.	63

I have confidence in the audit performed by AAB, along with their results. I have a corrective action plan (CAP) being developed to address the noted deficiencies. This CAP will be forwarded to you upon completion.

Please contact me at (661) 272-2540 if you have questions regarding this matter.

RTS:rs

RCUD AUG 10 '22 10:28

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
Audit and Accountability Bureau

PUBLIC COMMENTS AUDIT – PATROL OPERATIONS
NORTH PATROL DIVISION – PALMDALE SHERIFF'S STATION
Project No. 2022-4-A

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Public Comments Audit – Patrol Operations – North Patrol Division, Palmdale Sheriff's Station under the authority of the Sheriff of Los Angeles County. The audit was performed to determine how the Los Angeles County Sheriff's Department's (Department) Palmdale Sheriff's Station (Palmdale) adhered to the Manual of Policy and Procedures (MPP), Unit Orders, and the provisions of the United States Department of Justice (DOJ) Antelope Valley Settlement Agreement (AV Agreement)¹ regarding public comments, specifically service and personnel complaints documented on the Watch Commander Service Comment Report (SCR).²

The AAB conducted this audit under the guidance of Generally Accepted Government Auditing Standards.³ The AAB determined the evidence obtained was sufficient and appropriate to provide reasonable assurance of the results based on the audit objectives.

BACKGROUND

On April 28, 2015, the Department entered into the AV Agreement with the DOJ regarding police services in the Antelope Valley area which includes the cities of Lancaster and Palmdale, and the surrounding unincorporated Los Angeles County areas. In the AV Agreement, the Department agreed to ensure all public complaints are received, properly classified, and fully and fairly investigated.

The Department classifies public complaints into two categories: service complaints and personnel complaints.⁴ Service complaints are external communications of dissatisfaction with Department service, procedures or practices, response times, traffic citations, and those not involving employee misconduct. Personnel complaints are external allegations of misconduct against a Department member, either a violation of law or Department policy, to include but not limited to: discourtesy; dishonesty; unreasonable force; improper tactics; improper detention, search or arrest; neglect of duty; operation of vehicle; off-duty conduct; harassment; or discrimination.

¹ United States Department of Justice – Los Angeles County Sheriff's Department, Settlement Agreement Number CV 15-03174, April 2015.

² Manual of Policy and Procedures §3-04/010.05, Procedures for Department Service Reviews, December 2013.

³ United States Government Accountability Office, Government Auditing Standards, July 2018.

⁴ Manual of Policy and Procedures §3-04/010.00, Department Service Reviews, December 2013.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION

Project No. 2022-4-A

Public trust is vital to the Department’s mission and rests on the Department’s responsiveness to community needs and expectations. To foster public confidence in the Department and to promote constructive communication, public comments must be received with equal professional interest and courtesy, and given appropriate supervisory attention.⁵

PRIOR AUDITS

The AAB has conducted four prior public comments audits for Palmdale Sheriff’s Station.

METHODOLOGY

Scope

The audit encompassed seven main objectives and included an evaluation of completed SCR reviews from the Palmdale Sheriff’s Station to ensure compliance with the MPP, Unit Orders, Service Comment Report Handbook, and the AV Agreement. An SCR review was considered completed when approved and signed by the division commander.

- Objective No. 1 – Complaint Intake: To determine if personnel complaint forms and informational materials are made available to the public as required; if complaints made were accepted and reviewed; if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.
- Objective No. 2 – Complaint Classification: To determine if personnel complaints were not classified as service complaints; if complaints were appropriately classified; if allegations of misconduct were investigated.
- Objective No. 3 – Investigations: To determine if complaints were investigated thoroughly and by the appropriate/required individuals; if all persons at the scene giving rise to a misconduct allegation were identified; if interviews were performed, conducted separately, and recorded in their entirety.
- Objective No. 4 – Adjudication of a Service Comment Report: To determine whether the disposition of an SCR review was supported by sufficient information and relevant evidence.

⁵ Manual of Policy and Procedures §3-04/000.00, Personnel Investigations, April 1996.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION

Project No. 2022-4-A

- Objective No. 5 – Timeliness: To determine whether the SCR review was completed and forwarded to Division Headquarters within 30 days; if the SCR review was forwarded to the Discovery Unit within 60 days.
- Objective No. 6 – Accuracy of the SCR information in the Performance Recording and Monitoring System (PRMS): To determine whether the Result of Service Comment Review and the SCR information were entered accurately in PRMS.
- Objective No. 7 – Completion of Corrective Action: To determine if the personnel complaint disposition recommends corrective action, and if it was subsequently completed, and documented.

Auditors reviewed documentation comprised of completed SCR forms, Result of Service Comment Review forms, associated memoranda, correspondence, reports, audio and video recordings, and photographs. The SCR reviews were obtained from Palmdale Sheriff’s Station and Risk Management Bureau’s Discovery Unit. Additional documentation was obtained from Palmdale Sheriff’s Station.

In order to measure the Department’s compliance with the provisions of the AV Agreement, auditors conducted a qualitative assessment, as necessary, throughout the audit. This included an assessment of all available documentation for each SCR review to determine whether the complaints were received, appropriately classified, fully and fairly investigated up to the adjudication of the complaint in compliance with the applicable criteria. Finally, auditors verified accurate recording in the PRMS and that recommended corrective actions were completed.⁶

Audit Time Period

The audit time period was from July 1, 2021 through September 30, 2021.

⁶ AV Agreement, XI. Monitoring, B. Compliance Reviews and Audits, paragraph 149, April 2015, states compliance reviews and audits will contain both qualitative and quantitative elements as necessary for reliability and comprehensiveness.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION

Project No. 2022-4-A

Audit Population

All documented service and personnel complaints generated by the public against personnel from the Palmdale Sheriff’s Station, which were fully investigated with final approval by a commander at the division level, were included in the population. Twenty SCR reviews were identified from the data sources for the audit time period. Of the 20 SCR reviews, 17 were personnel complaints and three were service complaints. Three SCRs initiated at Palmdale during the audit time period were excluded from the population. Two were not completed by the fieldwork phase of the audit and one was forwarded to a custody facility which was responsible for conducting the review.

The SCR population was identified through the PRMS, Service Comment Module.⁷ The population was also cross referenced with entries in the Station/Bureau Administration Portal (SBAP).⁸ External commendations documented on SCR forms were not included in the audit.

Patrol station watch commanders are responsible for documenting in the Watch Commander’s Daily Log when a public complaint is received. This includes documenting anytime an SCR form is completed. The Watch Commander’s Daily Log is stored as an electronic record in the SBAP. Auditors reconciled this to the PRMS records.

All use of force incidents and civil claims used in Objective No. 2(c) were identified through the PRMS, Force Module and Claim Module. These items were cross referenced with entries in the SBAP.

Auditors identified varying populations to examine the different aspects of the seven main objectives, which are described in the Audit Details and Results Section of this report.

⁷ The PRMS provides systematic recording of data relevant to incidents involving uses of force, shootings, and commendations/complaints involving Department personnel. The Service Comment Module contains information on personnel and service complaints.

⁸ The SBAP is a data entry system designed to collect and track data related to risk management incidents at patrol stations. The system includes data on use of force, traffic collisions, public comments, pursuits, administrative investigations, and employee injuries and lawsuits/claims.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

AUDIT DETAILS AND RESULTS

Objective No. 1 – Complaint Intake

Objective No. 1(a) – Determine if personnel complaint forms and informational materials are made available to the public, as required.

Criteria

Manual of Policy and Procedures, Section 3-04/010.35, Public Accessibility to Information About the Complaint Process (October 2014), states:

Each Bureau, Station and facility shall maintain a supply of the Department forms SH-CR-596 and SH-CR-596A (Spanish version). These forms, entitled "Procedures For Public Complaints," explain how the Department conducts complaint inquiries...

Palmdale Sheriff’s Station Unit Order Number 14-06, Supplemental Supervisory Responsibilities, Community Complaints (June 2018), states:

Any Limited English Proficient (LEP) individual who wishes to file a complaint about a deputy or employee shall be provided with a complaint form and informational materials in the appropriate non-English language and/or be provided appropriate translation services in order to file a complaint.

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 124 (April 2015), states:

LASD shall continue to make personnel complaint forms and informational materials, including brochures and posters, available at appropriate County or municipal properties in the Antelope Valley, including, at a minimum, LASD stations, courts, county libraries, and LASD websites, and make them available to community groups upon request.

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

... Any Limited English Proficient (LEP) individual who wishes to file a complaint about a LASD deputy or employee shall be provided with a complaint form and

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

informational materials in the appropriate non-English language and/or be provided appropriate translation services in order to file a complaint.

Antelope Valley Settlement Agreement Compliance Metrics, Paragraph 124 and 125 (October 2019), Section 3C states:

3. *LASD will be deemed in substantial outcomes compliance when it:*

C. *Upon inspection, no more than one of the operable locations above fails to have any of the requisite complaint materials available.*

The unavailability of complaint material at a non-LASD facility will not be considered a failure if LASD has documented they have made reasonable efforts within 30 days preceding the inspection(s) to ensure complaint material was readily available at the location.

Procedures

On March 3, 2022 auditors visited Palmdale Station, Littlerock Library, Acton Agua Dulce Library, and the Department’s website to determine whether English and Spanish personnel complaint forms and informational materials and/or translation services were available to LEP individuals.

Results

All three sites and the Department website (100%) met the criteria for this objective. Each location and the Department website had the required forms and informational material.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 1(b) – Determine if complaints made through the dispatch center were accepted and reviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance...

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

LASD will continue to accept all personnel complaints, including anonymous and third-party complaints, for review and investigation. Complaints may be made in writing or verbally, in person or by mail, telephone (or TDD), facsimile, or electronic mail, as well as in the field...

Procedures

Auditors obtained and examined recorded inbound dispatch telephone call segments to determine whether incoming telephone call complaints were accepted. Auditors identified a total of 4,925 inbound station dispatch telephone call segments from the Voice Print International (VPI) system for the month of August 2021. A statistically valid random sample⁹ of 94 call segments was selected to determine whether all complaints were accepted and reviewed during their initiation.

Results

The 94 station telephone operator call segments reviewed did not result in any complaints.

⁹ Using a statistical one-tail test with a 95% confidence level and a 4% error rate, a statistically valid random sample was identified.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 1(c) – Determine if complaints made to the watch commander’s telephone line were accepted and reviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance...

Manual of Policy and Procedures, Section 3-09/010.05, Procedures for Department Service Reviews (December 2013), states:

...Department service reviews shall be documented on Service Comment Report forms. The Watch Commander of the Unit shall initiate a service review by immediately interviewing any member of the public who, whether in person or by telephone, offers a comment...

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 125 (April 2015), states:

LASD will continue to accept all personnel complaints, including anonymous and third-party complaints, for review and investigation. Complaints may be made in writing or verbally, in person or by mail, telephone (or TDD), facsimile, or electronic mail, as well as in the field...

Procedures

When complainants call the Palmdale Sheriff’s Station, their initial point of contact is a station telephone operator or a dispatcher. Complaint calls are then forwarded to the watch commander. The watch commander’s line is a recorded telephone line.

Auditors identified a total of 304 inbound recorded watch commander telephone call segments from the VPI system for the month of August 2021. A statistically valid random sample of 73 call segments was selected to determine if complaints were made and accepted by the watch commander at the Palmdale Sheriff’s Station.

Of the 73 call segments, 67 were not complaints. The remaining six call segments were complaints, and were evaluated for this objective.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Results

Two (33%) of the six complaint calls met the criteria for this objective. The four remaining complaint calls contained comments from members of the public that should have resulted in the initiation of an SCR. Three calls should have been recorded as service complaints, while the remaining call should have been a personnel complaint.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 1(d) – Determine if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

Criteria

Palmdale Sheriff’s Station Unit Order Number 14-06, Supplemental Supervisory Responsibilities, Community Complaints (June 2018), states:

The refusal to accept a personnel complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, shall be grounds for discipline.

Antelope Valley Settlement Agreement, Subsection A, Complaint Intake, paragraph 126 (April 2015), states:

The refusal to accept a personnel complaint, discouraging the filing of a complaint, or providing false or misleading information about filing a complaint, shall be grounds for discipline, up to and including termination.

Procedures

Auditors evaluated 20 SCR reviews identified for the audit time period, including related source documentation and audio/video files, to determine whether a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.

Of the 20 SCR reviews, four were received from sources other than Palmdale Sheriff’s Station and were excluded from this objective. Therefore, the remaining 16 SCR reviews were evaluated for this objective.

Results

All 16 (100%) SCRs met the criteria for this objective. All were submitted without indication of discouraging the complainant or providing false or misleading information about filing of the complaint.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

The table below summarizes the filing locations for all the SCR reviews.

Table No. 1 – Complaint Filing Location

Complaint Received By	Number of SCRs
Palmdale Sheriff’s Station	16
Website/Fax/Email at Internal Affairs Bureau	4
TOTAL	20

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 2 – Complaint Classification

Objective No. 2(a) – Determine if personnel complaints were misclassified as service complaints.

Criteria

Manual of Policy and Procedures, Section 3-04/010.00, Department Service Reviews (December 2013), states:

The Department will accept and review any comment from any member of the public concerning Departmental service or individual performance...

- *Service Complaint: an external communication of dissatisfaction with Department service, procedure or practice, not involving employee misconduct; and*
- *Personnel Complaint: an external allegation of misconduct, either a violation of law or Department policy, against any member of the Department.*

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 128 (April 2015), states:

LASD will ensure that personnel complaints are not misclassified as service complaints.

Antelope Valley Settlement Agreement Compliance Metrics, Paragraph 128, 130, 131 (partial) & 140 (partial), (October 2019), Section 3B states:

3. *LASD will be deemed in substantial outcomes compliance when:*

- B. At least 95% of public complaints are classified properly as a service and/or personnel complaint at intake, resolution, and adjudication, or corrected during the management review.*

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to ensure they were properly classified as service complaints. Seventeen of the SCR reviews were excluded from this objective because they were personnel complaints. Therefore, auditors evaluated three service complaint SCR reviews for this objective.

Results

All three (100%) service SCRs reviewed met the criteria for this objective. All of the SCRs were appropriately classified as service complaints.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 2(b) – Determine whether Service Comment Reports were appropriately classified.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

The Watch Commander shall place a mark in the appropriate box indicating the nature of the comment, and shall mark the appropriate sub-category(s) as accurately as possible.

Manual of Policy and Procedures, Section 3-04/010.25, Personnel Complaints (October 2014), states:

The Watch Commander shall also check the fact page of the Service Comment form and ensure that it is filled out completely and correctly. He shall confirm that the proper categories are marked reflecting the nature of the complaint...

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 130 (April 2015), states:

Antelope Valley unit commanders shall be responsible for appropriately classifying each allegation and personnel complaint raised at the outset or during the investigation/review of a complaint...

Procedures

Auditors evaluated the 20 SCR reviews, including their related source materials to determine whether the complaints were appropriately classified during the initial intake, or were later modified to reflect the correct classification.

Results

All 20 (100%) SCRs met the criteria for this objective.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 2(c) – Determine if all allegations of misconduct were investigated.

Criteria

Palmdale Sheriff’s Station Unit Order Number 14-06, Supplemental Supervisory Responsibilities (June 2018), Community Complaints, states:

Supervisors shall ensure that all allegations of personnel misconduct are documented and are fully and fairly investigated...

Antelope Valley Settlement Agreement, Subsection B, Complaint Classification, paragraph 130 (April 2015), states:

... LASD shall investigate every allegation of misconduct that arises during an investigation even if an allegation is not specifically articulated as such by the complainant.

Procedures

Auditors identified and reviewed 59 use of force incidents that occurred during the audit time period. In addition, five civil claims and three lawsuits were filed during the audit time period and were reviewed. Auditors determined whether allegations of misconduct were present and, if so, that they were documented on an SCR and investigated.

Of the 67 use of force incidents, civil claims and lawsuits claims reviewed, 53 did not contain allegations of misconduct. Therefore, the remaining 14 were evaluated for this objective.

Results

One (7%) of the 14 incidents met the criteria for this objective. Thirteen of the fourteen incidents had allegations which were not documented on an SCR and not investigated.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3 – Complaint Investigations

Objective No. 3(a) – Determine if all investigations of personnel complaints were thorough as necessary to reach reliable, objective and complete findings.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 131 (April 2015), states:

All investigations of Antelope Valley personnel complaints, including reviews, shall be as thorough as necessary to reach reliable and complete findings. In each investigation, LASD shall consider all relevant evidence, including circumstantial, direct and physical evidence, as appropriate, and make credibility determinations based upon that evidence. There will be no automatic preference for a deputy’s statement over a non-deputy’s statement, nor will LASD disregard a witness’ statement merely because the witness has some connection to the complainant or because of any criminal history. LASD shall make efforts to resolve material inconsistencies between witness statements.

Procedures

Auditors examined the 20 SCR reviews to determine whether the complaints were thoroughly investigated. Three of the SCR reviews were excluded from this objective because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Auditors reviewed source documentation narratives, interviews, correspondence, and audio/video files. Auditors conducted a qualitative assessment of those documents to determine if supervisors documented and considered all relevant evidence as appropriate. This included determining whether or not all potential parties were contacted, interviews were recorded, and all involved Department personnel were identified and interviewed.

Results

All 17 (100%) personnel SCR reviews met the criteria for this objective. All investigations of personnel complaints were thorough as necessary.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(b) – Determine if alleged incidents of misconduct were referred to the Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB).

Criteria

Manual of Policy and Procedures, Section 3-04/010.25, Personnel Complaints (October 2014), states:

The concerned Unit Commander is responsible for evaluating each personnel complaint to determine the appropriate supervisory response. The nature and seriousness of the allegation(s), the potential for employee discipline, and the concerned employee’s performance history are potential factors to consider in the evaluation. Generally, the following courses of action are options:

- *request that ICIB conduct a criminal investigation if there is reason to believe a crime has been committed...*
- *request that IAB conduct an administrative investigation...*
- *conduct a Unit level administrative investigation; and*
- *initiate a service review.*

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 132 (April 2015), states:

LASD agrees to continue to require station commanders in the Antelope Valley to refer alleged incidents of misconduct to the IAB or ICIB for further investigation or review...

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials to determine whether complaints requiring referral to IAB or ICIB were referred. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Of the 17 personnel SCR reviews, one SCR review was required to be referred to IAB.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Results

The one (0%) incident did not meet the criteria for this objective. This allegation was not referred to IAB. This SCR review recommended further investigation; however, any further investigation was not documented.¹⁰

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¹⁰ Palmdale management stated that this incident was subsequently included with a separate allegation of misconduct and investigated together. The investigation is currently ongoing.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3 (c) – Determine if the Division Chief reviewed the matter with the unit commander of Internal Affairs Bureau if the case proceeded criminally.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 132 (April 2015), states:

... If the case proceeds criminally, the Division Chief over the Antelope Valley will review the matter with the unit commander of IAB to determine whether the administrative investigation may proceed on a parallel track. The Division Chief or unit commander of IAB may consult with the prosecuting agency for its input. If the matter proceeds on a parallel track, any compelled interview of the subject deputies may be delayed. The Division Chief shall document the reasons for the decision.

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to determine if the case proceeded criminally, and whether the Division Chief reviewed the matter with the unit commander of IAB.

Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective. Of the 17 personnel SCR reviews, none were evaluated for this objective because none proceeded criminally.

Results

None were applicable for this objective.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(d) – Determine if an involved supervisor, or any supervisor who authorized the conduct that led to the personnel complaint, did not conduct the complaint investigation.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 133 (April 2015), states:

LASD will not permit any involved supervisor, or any supervisor who authorized the conduct that led to the complaint, to conduct a complaint investigation.

Procedures

Auditors evaluated the 20 SCR reviews, including their related source materials, to determine whether the supervisor who conducted the SCR investigation was not an involved supervisor or any supervisor who authorized the conduct that led to the complaint unless sufficient justification was documented in the SCR investigation.

Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

All 17 (100%) applicable SCR reviews met the criteria for this objective. A supervisor, that was not involved and did not authorize the conduct that led to the personnel complaint conducted the investigation.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(e) – Determine if all persons at the scene giving rise to a misconduct allegation were identified.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 134 (April 2015), states:

The misconduct investigator shall seek to identify all persons at the scene giving rise to a misconduct allegation, including all LASD deputies. The investigator shall note in the investigative report the identities of all deputies and other witnesses who were on the scene but assert they did not witness and were not involved in the incident...

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to ensure all persons at the scene giving rise to a misconduct allegation were identified.

Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

Sixteen (94%) of the 17 personnel SCR reviews met the criteria for this objective. One SCR review did not identify all persons at the scene giving rise to the misconduct allegation.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(f) – Determine if the complainant, involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

The Watch Commander of the Unit shall initiate a service review by immediately interviewing any member of the public who, whether in person or by telephone, offers a comment.

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 135 (April 2015), states:

All witnesses, including deputies witnessing or involved in an incident that becomes the subject of a personnel complaint, shall provide a written statement regarding the incident or be interviewed ...

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 136 (April 2015), states:

The SCR complaint investigator shall interview each complainant in person, if practical...

Procedures

Auditors evaluated the 20 SCR reviews, including related source documentation and audio/video files, to determine whether the complainants, the involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

Sixteen (94%) of the 17 personnel SCR reviews met the criteria for this objective. The incident associated with this SCR included five employees who were on-scene during the incident who did not provide written statements and were not interviewed.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(g) – Determine if the complainant and non-deputy witness interviews were recorded in their entirety.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

During telephonic comments or complaints, the Watch Commander shall field the call on a taped line if equipment is in place to do so ...

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 136 (April 2015), states:

... Interviews shall be recorded in their entirety, absent documented extraordinary circumstances.

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether existing complainant and witness (non-deputy) interviews were recorded in their entirety, absent documented extraordinary circumstances. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

All 17 (100%) personnel SCR reviews met the criteria for this objective.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(h) – Determine if complainant, involved employee, and all witness (including deputy) interviews were conducted separately.

Criteria

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 137 (April 2015), states:

Consistent with current policy, interviews shall be conducted separately...

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether the complainants, the involved employee, and all witness (including deputy) interviews were conducted separately. Of the 20 SCR reviews, three were excluded because they were service complaints. Therefore, auditors evaluated 17 personnel SCR reviews for this objective.

Results

Fifteen (88%) of the 17 SCR reviews met the criteria for this objective. Two SCR reviews did not document whether the involved employees were interviewed separately.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 3(i) – Determine if interpreters used for Limited English Proficient (LEP) complainants or witnesses were not party to the complaint, if applicable.

Criteria

Palmdale Sheriff’s Station Unit Order Number 14-06, Community Complaints (June 2018), Accepting Complaints, states:

Any Limited English Proficient (LEP) individual who wishes to file a complaint about a deputy or employee shall be provided with...appropriate translation services...

Manual of Policy and Procedures, Section 3-09/004.00, Limited English Proficiency and Language Assistance Plan (April 2018), states:

Department members shall take reasonable steps to ensure effective and accurate communication with a LEP individual when providing assistance or Department programs and services. Personnel will use qualified bilingual persons as translators and interpreters as set forth in this policy...

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 137 (April 2015), states:

... An interpreter not involved in the underlying complaint will be used when taking statements or conducting interviews of any LEP complainant or witness.

Procedures

Auditors evaluated the 20 SCR reviews, including related source materials, to determine whether interpreters used for LEP complainants or witnesses were party to the complaint.

Results

None of the complainants or witnesses in the 20 SCR reviews required an LEP interpreter.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 4 – Adjudication of the Service Comment Report – Determine if the disposition of the Service Comment Report review was supported by sufficient information and relevant evidence.

Criteria

Service Comment Report Handbook, Section III, Adjudication of an SCR (June 2011), states:

*...Service reviews should be concise yet need to include sufficient information in order for the **Unit Commander** to make an appropriate assessment. The review should be objective and each allegation should be thoroughly addressed. During the adjudication stage, it is the responsibility of the Unit Commander to ensure that the recommended disposition is supported by the statements and evidence...*

C. Adjudication of an SCR:

*If the complaint is handled as a service review, then the **Unit Commander** is responsible for approving the recommended review disposition. The service review must contain sufficient information in order for the Unit Commander to make a final determination and that determination must be supported by the information contained in the review...*

*The **Unit Commander** should use neutral and objective criteria, weigh evidence appropriately to distinguish strong evidence from questionable or less material evidence, and not indulge in presumptions that bias the findings...*

E. Directions for Completing the “Result of Service Comment Review” Form:

2). **REVIEW DISPOSITION:**

c). **Review Comp - Service Only - No Further Action:**

(Used only when a complaint is categorized as a “Service Complaint.”)...

d). **Employee Conduct Appears Reasonable:** *(Review indicated the employee’s actions appear to be in compliance with procedures, policies, guidelines or training.)...*

e). **Appears Employee Conduct Could Have Been Better:** *(The employee’s actions were in compliance with procedures, policies, and guidelines. The complaint could have been minimized if the employee had employed tactical communication principles or common sense.)...*

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

- f). **Employee Conduct Should Have Been Different:** *(The employee’s actions were not in compliance with established procedures, policies, guidelines or training. Watch Commander will take appropriate action.)...*
- g). **Unable to Make a Determination:** *(The review revealed insufficient information to assess the employee’s alleged conduct or to identify the employees involved.)...*
- h). **Resolved - Conflict Resolution Meeting:** *(A conflict resolution meeting with the reporting party and involved employee(s) was held. The meeting adequately addressed all concerns and no further actions are deemed necessary.)...*

Antelope Valley Settlement Agreement, Subsection C, Investigations, paragraph 131 (April 2015), states:

...There will be no automatic preference for a deputy’s statement over a non-deputy’s statement, nor will LASD disregard a witness’ statement merely because the witness has some connection to the complainant or because of any criminal history. LASD shall make efforts to resolve material inconsistencies between witness statements.

Antelope Valley Settlement Agreement, Subsection E, Personnel Complaint Audits, paragraph 140 (April 2015), states:

LASD shall conduct a semiannual, randomized audit of LASD-AV’s complaint intake, classification, and investigations. This audit will assess whether complaints are accepted and classified consistent with policy, investigations are complete, and complaint dispositions are consistent with a preponderance of the evidence.

Procedures

The adjudication of an SCR is documented on the *Result of Service Comment Review* form and is evidenced by the Unit Commander’s signature attesting he/she agreed with the recommended disposition made by the supervisor completing the investigation. Auditors examined the SCR reviews to determine whether the disposition was supported by sufficient information and relevant evidence contained in the review. This included assessing whether automatic preference for a deputy’s statement was given over a non-deputy’s statement.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Results

Twenty-nine (91%) of the 32 SCR dispositions met the criteria for this objective. Three SCR dispositions were not supported by sufficient information and related evidence. Employees who were present during the incident were neither interviewed nor provided a written statement.

Table No. 2 represents the dispositions for the SCRs reviewed. The number of dispositions does not equal the number of SCRs in the audit period because multiple Department members may have been involved in a single complaint requiring a separate disposition for each Department member.

Table No. 2 - Result of Service Comment Review

Review Disposition	Number of Dispositions
Review Completed – Service Only	3
Employee Conduct Appears Reasonable	19
Appears Employee Conduct Could Have Been Better	4
Employee Conduct Should Have Been Different	5
Unable to Make a Determination	1
Resolved – Conflict Resolution Meeting	0
Unit Level Administrative Investigation Initiated	0
Exoneration	0

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 5 – Timeliness

Objective No. 5(a) – Determine if the Service Comment Report review was completed within 30 days and forwarded to Division.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

NOTE:

Watch Commander Service Comment Reports shall be completed within 30 calendar days...

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

Service reviews shall be completed within 30 calendar days...

Procedures

Auditors examined the 20 SCR reviews for their complaint intake dates and the dates the unit commander signed the SCR reviews, including the dates Division Headquarters time stamped the received SCR review. Auditors determined whether the SCR reviews were completed within 30 calendar days and forwarded to Division Headquarters.

Results

None (0%) of the 20 SCR reviews met the criteria for this objective.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

The table below summarizes the duration for the SCR reviews to be completed at the unit level.

Table No. 3 - Timely Completion of the SCR Reviews

Number of Days for SCR review to be completed	
0-30 Days	0
31-40 Days	1
41-50 Days	2
51-60 Days	4
61-70 Days	2
71-80 Days	4
81-90 Days	3
91+ Days	4
TOTAL	20

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 5(b) – Determine if the Service Comment Report review was forwarded to the Discovery Unit within 60 days.

Criteria

Manual of Policy and Procedures, Section 3-04/010.05, Procedures for Department Service Reviews (December 2013), states:

...Unit Commanders shall ensure that the Service Comment Report is completed and forwarded to the Discovery Unit within 60 days of receipt of the initial complaint.

Service Comment Report Handbook, Section III, Subsection A(1), Due Dates (June 2011), states:

The completed SCR package shall be forwarded to the Discovery Unit within 60 calendar days...

Procedures

Auditors examined the 20 SCR reviews for their complaint intake dates and PRMS for the Discovery Unit’s received date to determine whether the SCR review was forwarded to the Discovery Unit within 60 days.

Results

One (5%) of the 20 SCR reviews met the criteria for this objective. The remaining 19 SCRs did not document any delays that prevented the timely completion and submission to the Division Headquarters.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

The table below summarizes the duration for the SCR reviews to be forwarded to division headquarters.

Table No. 4 – SCR Reviews Forwarded to Division Headquarters

Number of Days for SCR review to be forwarded to Division	
0-60 Days	1
61-70 Days	1
71-80 Days	3
81-90 Days	2
91-100 Days	4
101-110 Days	3
111-120 Days	1
121+ Days	5
TOTAL	20

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 6 – Accuracy of the Service Comment Report Data

Objective No. 6(a) – Determine if the Result of Service Comment Review information was entered accurately in the Performance Recording and Monitoring System.

Criteria

Service Comment Report Handbook, Section III, Adjudication of an SCR, (June 2011), states:

*...Service reviews should be concise yet need to include sufficient information in order for the **Unit Commander** to make an appropriate assessment. The review should be objective and each allegation should be thoroughly addressed. During the adjudication stage, it is the responsibility of the Unit Commander to ensure that the recommended disposition is supported by the statements and evidence.*

*In addition to the **Unit Commander** and **Division Chief/Commander**, independent reviewers have access to service reviews in order to assess our thoroughness and fairness.*

Service Comment Report Handbook, Section III, Subsection B, Result of Service Review (June 2011), states:

*Upon completion of a service review about a public personnel complaint, the **Unit Commander** shall ensure that the “Result of Service Comment Review” form is completed (MPP 3-04/010.25-Personnel Complaints, revised 01/05/03).*

Procedures

Auditors examined the 20 SCR reviews and their related entries in PRMS to determine whether the information on the Result of Service Comment Review form was accurately entered in PRMS. At the completion of audit field work, two SCR reviews had not been entered into PRMS.

Results

All eighteen (100%) SCR reviews met the criteria for this objective. The information on the Result of Service Comment Review information was accurately entered in the PRMS.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 6(b) – Determine if the Service Comment Report information was entered accurately in the Performance Recording and Monitoring System.

Criteria

Antelope Valley Settlement Agreement, Subsection A, Personnel Performance Index, paragraph 142 (April 2015), states:

LASD-AV will ensure that PPI [now PRMS] data is accurate and hold responsible Antelope Valley personnel accountable for inaccuracies in any data entered.

Procedures

Auditors examined the 20 SCR reviews and their entries in PRMS to determine whether information was accurately entered in PRMS. At the completion of field work for the audit, two of the SCR reviews had not yet been entered into PRMS.

Results

All eighteen (100%) SCR reviews met the criteria for this objective. The Service Comment Review information was accurately entered in the PRMS.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No. 7 – Completion of Corrective Action

Objective No. 7 – Determine if the personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.

Criteria

Service Comment Report Handbook, Section II, Conducting the “Service Review” of Complaint, Subsection H, Personnel Complaint Dispositions (April 2009), states:

Appears Employee Conduct Could Have Been Better...This disposition will generally result in corrective action, which may include verbal or documented counseling (Unit Performance Log entry), training, etc.

Service Comment Report Handbook, Section II, Conducting the “Service Review” of Complaint, Subsection H, Personnel Complaint Dispositions (April 2009), states:

Employee Conduct Should Have Been Different....This disposition will generally result in documented counseling (Unit Performance Log entry) or an appropriate level of corrective action.

Procedures

The disposition of an SCR is documented on the *Result of Service Comment Review* form and is evidenced by the Unit Commander’s signature approving the recommended disposition made by the supervisor completing the investigation.

Auditors examined the dispositions of the 17 personnel SCR reviews to determine whether the disposition was “Appears Employee Conduct Could Have Been Better” or “Employee Conduct Should Have Been Different”.

Of the 17 personnel SCRs, eight resulted in dispositions of either “Appears Employee Conduct Could Have Been Better” or “Employee Conduct Should Have Been Different”. Therefore, eight dispositions were evaluated for this objective.

Results

Five (63%) of the eight SCRs met the criteria for this objective. The remaining three SCRs contained recommendations for corrective action, but did not document that the corrective action was actually administered.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

SUMMARY OF AUDIT RESULTS

The audit yielded the following results:

Table No. 5 - Summary of Audit Results

Objective No.	Audit Objectives	Met the Criteria	
1	COMPLAINT INTAKE	2022	2021
1(a)	<i>Determine if personnel complaint forms and informational materials are made available to the public, as required.</i>	100%	100%
1(b)	<i>Determine if complaints made through the dispatch center were accepted and reviewed.</i>	Not Applicable	Not Applicable
1(c)	<i>Determine if complaints made to the watch commander’s telephone line were accepted and reviewed.</i>	33%	Not Applicable
1(d)	<i>Determine if a Department member refused to accept a personnel complaint, discouraged the complainant from filing a complaint, or provided false or misleading information about filing a complaint.</i>	100%	100%
2	COMPLAINT CLASSIFICATION		
2(a)	<i>Determine if personnel complaints were misclassified as service complaints.</i>	100%	100%
2(b)	<i>Determine whether Service Comment Reports were appropriately classified.</i>	100%	100%
2(c)	<i>Determine if all allegations of misconduct were investigated.</i>	7%	100%
3	INVESTIGATIONS		
3(a)	<i>Determine if all investigations of personnel complaints were thorough as necessary to reach reliable, objective and complete findings.</i>	100%	100%
3(b)	<i>Determine if alleged incidents of misconduct were referred to the Internal Affairs Bureau (IAB) or Internal Criminal Investigations Bureau (ICIB).</i>	0%	Not Applicable
3(c)	<i>Determine if the Division Chief reviewed the matter with the unit commander of Internal Affairs Bureau if the case proceeded criminally.</i>	Not Applicable	Not Applicable
3(d)	<i>Determine if an involved supervisor, or any supervisor who authorized the conduct that led to the personnel complaint, did not conduct the complaint investigation.</i>	100%	100%
3(e)	<i>Determine if all persons at the scene giving rise to a misconduct allegation were identified.</i>	94%	100%
3(f)	<i>Determine if the complainant, involved employees, and all witnesses (including deputies) provided a written statement of the incident or were interviewed.</i>	94%	100%
3(g)	<i>Determine if the complainant and non-deputy witness interviews were recorded in their entirety.</i>	100%	95%
3(h)	<i>Determine if complainant, involved employee, and all witness (including deputy) interviews were conducted separately.</i>	88%	95%
3(i)	<i>Determine if interpreters used for Limited English Proficient (LEP) complainants or witnesses were not party to the complaint, if applicable.</i>	Not Applicable	Not Applicable
4	ADJUDICATION OF A SERVICE COMMENT REPORT		
	<i>Adjudication of the Service Comment Report – Determine if the disposition of the Service Comment Report review was supported by sufficient information and relevant evidence.</i>	91%	100%
5	TIMELINESS		
5(a)	<i>Determine if the Service Comment Report review was completed within 30 days and forwarded to Division.</i>	0%	14%

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Objective No.	Audit Objectives	Met the Criteria	
5(b)	<i>Determine if the Service Comment Report review was forwarded to the Discovery Unit within 60 days.</i>	5%	33%
6	ACCURACY OF SCR REVIEW INFORMATION IN PRMS		
6(a)	<i>Determine if the Result of Service Comment Review information was entered accurately in the Performance Recording and Monitoring System.</i>	100%	Not Evaluated
6(b)	<i>Determine if the Service Comment Report information was entered accurately in the Performance Recording and Monitoring System.</i>	100%	100%
7	COMPLETION OF CORRECTIVE ACTION		
	<i>Determine if the personnel complaint disposition recommended corrective action that was subsequently completed by the Department employee.</i>	63%	Not Evaluated

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

OTHER RELATED MATTERS

Service Comment Report Training

Palmdale Station SCR training is conducted on an on-the-job basis once personnel are assigned to the Watch Commander post. Personnel expressed a concern that there is little clarity in what statements constitute comments that need to be documented in SCRs. Formalized training may reduce the likelihood that disparate interpretations of the SCR policies and procedures are made.

Documentation of the Date Discovery Unit Received the SCR Review

Auditors noted that the “Received at Discovery Unit by” section on the “Result of Service Comment Review” form was consistently incomplete. In order to obtain the date that Discovery Unit received the SCR review, auditors had to locate this information in PRMS. Therefore, every effort should be made to ensure that Discovery Unit properly documents the receipt of the completed SCR reviews to verify that documents were properly forwarded on a timely basis. This issue has been noted on a prior audit.

Recommendations and Corrective Actions

Auditors noted that the Watch Commander Memorandums contain sections with the following titles:

- Recommended Findings;
- Recommended Review Disposition;
- and Recommendation(s).

Auditors noted that Watch Commanders have included recommendations in these differing areas of the memorandums. This has created the risk that recommendations are missed and/or are in conflict with each other.

Furthermore, auditors noted that there is no place for watch commanders to document any administered corrective actions. The Service Comment Report Handbook recommends that watch commanders administer corrective action when warranted. In an effort to enhance accountability, the SCR form should allow for watch commanders to document corrective actions in a consistent manner.

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

CONCLUSION

The AAB auditors performed analyses and made assessments to identify areas that needed improvement. The AAB considers the results of this audit to be a helpful management tool for all Department personnel. The evidence presented provides reasonable assurance that Department personnel are not adhering to all of the audited provisions in the AV Agreement as identified in the above-mentioned criteria.

RECOMMENDATIONS

When Departmental policies and procedures and the AV Agreement are not adhered to, it may result in an increased risk for an inability to be compliant. Department management should disseminate the results of this audit to its personnel. Additionally, as best practice, Department management is encouraged to conduct recurring and ongoing briefing of policies and procedures. The AAB considers the results of this audit to be a helpful management tool and therefore, makes the following recommendations:

1. It is recommended the Department formalize the Service Comment Report training. Auditors noted that Palmdale management learns the SCR process primarily through on-the-job experience when they are assigned as Watch Commanders. Formal training may limit the risk that management apply SCR policies and procedures in a disparate manner. (All Objectives)
2. It is recommended Palmdale Sheriff’s Station conduct recurring and ongoing briefings to personnel on Unit Order No. 14-06 to ensure that all allegations of misconduct are documented on an SCR and investigated. An emphasis should be placed on allegations made during civil claim and lawsuit investigations. (Objective No. 2)
3. It is recommended the Department evaluate whether the current SCR Timeline – Summary of Due Dates in the SCR Handbook are feasible for SCR Reviews. (Objective No. 5)
4. Based on Department practice of corrective action resulting from a disposition of “Appears Employee Conduct Could Have Been Better” or “Employee Conduct Should Have Been Different,” it is recommended that the Service Comment Report Handbook, Section III, Subsection E(2), Directions for Completing the “Result of Service Comment Review” Form, be revised to require that corrective action be administered and documented in a consistent manner. (Objective No. 7).

PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

Views of Responsible Officials

On July 27, 2022, the North Patrol Division command staff submitted a formal response to the AAB concurring with the audit results.

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PUBLIC COMMENTS AUDIT – PALMDALE SHERIFF’S STATION
Project No. 2022-4-A

This audit was submitted on this August 2, 2022 by the Audit and Accountability Bureau. A copy of the audit report was provided to the Office of Inspector General.

Original signature on file at AAB

KENNETH DIAZ
Project Manager, Law Enforcement Auditor
Audit and Accountability Bureau
Los Angeles County Sheriff’s Department

Original signature on file at AAB

REGINALD LOUIE
Assistant Project Manager, Sergeant
Audit and Accountability Bureau
Los Angeles County Sheriff’s Department

Original signature on file at AAB

M. ROWENA NELSON
Head Compliance Officer
Audit and Accountability Bureau
Los Angeles County Sheriff’s Department

Original signature on file at AAB

RICHARD L. HIRSCH
Acting Captain
Audit and Accountability Bureau
Los Angeles County Sheriff’s Department