

# LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

## AUDIT AND ACCOUNTABILITY BUREAU



### Public Complaints Audit

### Part I

### Antelope Valley Stations

Project No. 2024-2-A



**Los Angeles County Sheriff's Department  
Audit and Accountability Bureau**

**Part I of Public Complaints Audit:  
Assessment of Availability and Acceptance of Complaint Information Audit  
Antelope Valley Sheriff's Stations  
Project No. 2024-2-A**

**AUDIT REPORT**

**PURPOSE**

The Audit and Accountability Bureau (AAB) conducted the Public Complaints Audit under the authority of the Los Angeles County Sheriff's Department (LASD or the Department), pursuant to the United States Department of Justice<sup>1</sup> (DOJ) Antelope Valley (AV) Settlement Agreement (Agreement).

The Public Complaints Audit was conducted in three separate audits (Part I, II, and III) to provide timely feedback to Lancaster and Palmdale Patrol Stations (AV Stations). Each of the two audits addressed the requirements of the AV Agreement.

**OBJECTIVE, SCOPE, AND METHODOLOGY**

**Audit Scope and Criteria**

This audit (Project No. 2024-2-A), designated as Part I, focused on assessing the complaint materials and the acceptance of complaints involving the AV Stations. A second audit (Project No. 2024-23-A) is planned for July 2024.

The AAB will evaluate all the objectives in both audits, which will be conducted as indicated in Table 1 below.

**Table 1 – Part I Projected Due Dates and Audit Time Period**

Project No.	Projected Due Date	Population Time Period
Project No. 2024 – 2 – A	March 2024	February 9, 2024, through March 11, 2024
Project No. 2024 – 23 – A	July 2024	Month of June 2024

<sup>1</sup> United States of America v. The County of Los Angeles and The Los Angeles County Sheriff's Department. Case Number CV 15-03174, April 28, 2015.

The Department's compliance was measured against the AV Agreement Compliance Metrics (compliance metrics) provided by the AV DOJ Compliance Unit, along with additional direction provided by the AV Monitoring Team (MT).

### **Audit Population and Sampling**

For this audit, the selected time period was February 9, 2024, through March 11, 2024. The population consisted of displayed complaint informational posters, brochures, and complaint forms at the required locations, along with public complaints submitted via various methods during the audit period.

The auditors evaluated six mail-in complaints, two emailed complaints, and 22 telephone complaints. The auditors may expand the population size for future audits depending on the selected audit time period.

### **AUDIT OBJECTIVES**

The audit consisted of two main objectives with a total of 8 sub-objectives. Under the direction of the MT, the auditors evaluated the AV Stations separately for each objective and combined the results to determine if the Department complied with the compliance metrics.

### **Summary of Preliminary Findings**

The auditors noted the following preliminary findings during the audit:

#### **Sub-Objectives that Met the Compliance Metrics**

The auditors observed the AV Stations met the compliance metrics for six [Objective 1(a), 1(b), 1(c), 1(d), 2(b), and 2(c)] of the 8 sub-objectives. The AAB would like to acknowledge the concerted efforts made by the AV Stations in implementing the practices required by the AV Agreement for these sub-objectives. The auditors recommend the AV Stations continue implementing these required policies to institute meaningful and positive changes within the AV community. The AAB will re-evaluate these objectives in each recurring audit to determine if compliance was sustained.

#### **Sub-Objectives that Did Not Meet the Compliance Metrics**

The auditors observed the AV Stations failed to meet the compliance metrics for two [Objective 2(a) and 2(d)] of the 8 sub-objectives. The AV Stations are mandated to meet or exceed those agreed upon compliance metrics.

The AAB will re-evaluate these objectives in each recurring audit to measure improvement. In addition, the recurring audits will ensure timely recommendations are provided to the AV Stations to allow for prompt implementation of corrective actions for the objectives that continue to be out of compliance.

Table 2 below indicates the audit results based on the AV Stations' compliance and the compliance metrics.

**Table No. 2 – Summary of Compliance Metric Findings**

Objective No.	Audit Objectives	LAN	PLM	AV Total	Compliance Finding	Compliance Metric
<b>1</b>	<b>AVAILABILITY OF COMPLAINT INFORMATION</b>					
1(a)	<i>Specified Facilities</i>					
	• <i>AV Station Lobbies</i>	100%	100%	100%	In Compliance	100%
	• <i>Other Required Locations</i>	100%	100%	100%	In Compliance	100%
1(b)	<i>Community Groups</i>	100%	100%	100%	In Compliance	100%
1(c)	<i>Department Website</i>	100%	100%	100%	In Compliance	100%
1(d)	<i>Station Websites</i>	100%	100%	100%	In compliance	100%
<b>2</b>	<b>ACCEPTING PUBLIC COMPLAINTS</b>					
2(a)	<i>Mail-in Form</i>	100%	100%	100%	In Compliance	100%
2(b)	<i>Email Complaints</i>	100%	100%	100%	In Compliance	100%
2(c)	<i>Department 800 Number</i>	100%			In compliance	100%
2(d)	<i>AV Station Phones</i>					
	• <i>Calls transferred to supervisor without unnecessary delay</i>	75%	100%	88%	Not in Compliance	100%
	• <i>Supervisor's willingness to accept the complaint</i>	83%	50%	67%	Not in Compliance	100%

## DETAILED PRELIMINARY FINDINGS

### Objective No. 1 – Availability of Complaint Information

This objective evaluated whether public complaint information was displayed and accessible to the public as specified in the compliance metrics. The Department and AV Stations were evaluated “In Compliance” at 100% for all four subobjectives in Objective No. 1.

### Objective No. 2 – Accepting Public Complaints

This objective evaluated the acceptance of public complaints as specified in the compliance metrics. The Department and both AV Stations were evaluated as “In Compliance” at 100% for sub-objectives 2(a), 2(b) and 2(c). However, for sub-objective 2(d), AV Stations were evaluated as “Not in Compliance”. See Table No. 3 for detailed findings.

#### Objective No. 2(d) – AV Station Phones

##### Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaint Intake, Paragraphs 125 and 126 (October 2019), Sections 3A and 3B states:

- A. ***At all times***, LASD’s telephone and internet systems allow for acceptance of personnel complaints via telephone, fax, and email.
- B. *Requests to make a personnel complaint are referred to a supervisor without unnecessary delay.*

##### Procedures

The auditors called the public telephone number provided on each AV Station’s website to determine if the Department’s telephone system allows acceptance of complaints via the AV Station telephone lines. The auditors did not identify themselves, nor did they reveal any information that would affect the validity of the test during the call. The calls were made over several days on random dates, including weekdays and weekends, covering all three shifts (AM, PM, and EM). Calls were conducted in both English and Spanish.

The auditors contacted the front desk, requested to make a personnel complaint, and waited for the transfer to a supervisor without unnecessary delay. If callers were successfully connected to a supervisor, they asked for the supervisor’s name, stated that they wished to make a complaint against a deputy, and asked if the supervisor could assist them. If the supervisor was willing to assist with the complaint over the phone, the auditor would cite an excuse to end the call. For the calls that were made in Spanish, the auditors documented if they were offered translation services to facilitate the complaint intake.

**Preliminary Findings:**

**Table No. 3 – AV Station Phone Complaints**

Objective No. 2(d) – AV Station Phones			
Acceptance of Complaints via AV Station Phones	LAN	PLM	AV Total
<ul style="list-style-type: none"> <li>• Calls transferred to supervisor without unnecessary delay</li> </ul>	75%	100%	88%
<ul style="list-style-type: none"> <li>• Supervisor’s willingness to accept the complaint.</li> </ul>	83%	50%	67%

**Calls Transferred to Supervisor without Unnecessary Delay**

**Lancaster Station**

Lancaster Station did not meet the criteria for this objective. Six (75%) of the eight calls received by desk personnel were successfully transferred to the Lancaster Station Watch Commander line without unnecessary delay. On the remaining two calls, the station told the Spanish callers via translator services, to go in person to the station and that no one could help them over the phone.

**Palmdale Station**

Palmdale Station met the criteria for this objective at a 100% compliance rate. All eight calls received by desk personnel were appropriately transferred to the Palmdale Station Watch Commander line without unnecessary delay.

## **Supervisor's Willingness to Accept the Complaint**

### Lancaster Station

Lancaster Station did not meet the criteria for this objective. Although six of the eight calls were transferred to the Lancaster Station Watch Commander line without unnecessary delay, only five of the six calls (83%) were connected successfully to a watch commander willing to assist with the complaint. The remaining call was transferred to the watch commander line however, the call rang for over 15 minutes without anyone answering the call.

### Palmdale Station

Palmdale Station did not meet the criteria for this objective. Although all eight calls were transferred to the Palmdale Station Watch Commander line without unnecessary delay, only four (50%) of the eight calls were connected successfully to a watch commander willing to assist with the complaint. The remaining four calls were determined to be "Not in Compliance" with the metrics. One of the four complaint calls rang for over 10 minutes without anyone answering or being connected to a voicemail. Another of the four calls was transferred to the watch commander line and then reconnected with the telephone operator, who took down a name and callback number. The caller never received a call back regarding that complaint. For the two remaining calls, on one complaint call, the deputy did not remain on the line once the caller was connected to a translator. The translator's purpose is to facilitate communication when language barriers exist between complainant and station personnel. The use of translators is not intended to replace AV station personnel's duties to accept complaints. Therefore, without the deputy on the call, the complaint was not taken. Lastly, the last call was returned to the desk line where a deputy told the caller he could assist with the complaint. The policy states only supervisors are allowed to accept complaints.

### Recommendations

Community members commonly contact the AV Stations via telephone to request assistance. The Department allows telephone communication as a resource for the public to voice their issues to a supervisor. If a community member's call is not returned or handled appropriately, the Department is viewed as unwilling to address the community's concerns.

It is recommended the Department reinforce existing policies with the Watch Commanders to ensure they are making concerted efforts to return telephone calls to complainants and document all phone complaints and return calls, in the Watch Commander Log for accountability and any necessary follow-up.

It is recommended that the AV Stations establish a protocol to conduct a weekly internal audit of the Watch Commander logs to identify phone complaints and determine whether they were accepted and processed. Any complaints found not to have been accepted should result in documented corrective action. The documentation of the weekly internal audit should be reviewed and approved by the station Captain.

It is also recommended that AV Stations brief personnel on MPP 3-09/004.00 Limited English Proficiency and Language Assistant Plan. Department personnel is required to provide accurate and effective communication with members of the public regardless of their level of English proficiency. Being a LEP person should not impede someone from submitting complaints. Furthermore, the AV Stations should also brief personnel that the use of translator services is not intended to substitute their duties to assist the public in Department programs and services.

## **CONCLUSION**

The AAB considers the results of this audit to be a helpful management tool for the AV stations. The evidence collected strongly suggests that AV station management is making significant efforts to respond to public complaints. However, the AV stations recognize that systematic changes to the existing process should be implemented to assure the AV community that all public complaints are taken seriously and given proper and immediate attention.

AV station personnel require ongoing training and a revision of intake policies which can only result in personnel compliance with Department policies, as well as the stipulations set forth in the AV Agreement and compliance metrics. This underscores the importance of addressing and rectifying these compliance gaps.

## **RECOMMENDATIONS**

The purpose of this report is to provide a detailed summary of the recommendations aimed at improving compliance with the AV Agreement. When Department policies and procedures are not adhered to, it may result in an increased risk or an inability to comply. The AAB makes the following recommendations:

### **Objective No. 2 – Accepting Public Complaints**

- a) While the AV Stations met compliance with the mail-in complaints, it is recommended that the AV Stations add an additional step to create a mail-in complaint log for Operations staff to document the receipt of mail-in complaints. This practice will improve the tracking of mail-in complaints and ensure proper attention is given to complaints received by the AV Stations.



- d) It is recommended the Department reinforce existing policies with the Watch Commanders to ensure they are making concerted efforts to return telephone calls to complainants and document all phone complaints and return calls, in the Watch Commander Log for accountability and any necessary follow-up.

It is recommended the station Operations lieutenant conduct a weekly internal audit of the Watch Commander Log to identify phone complaints and determine whether they were accepted and processed. Any complaints found not to have been accepted should result in documented corrective action. The documentation of the weekly internal audit should be reviewed and approved by the station Captain.

It is also recommended that AV Stations brief personnel on MPP 3-09/004.00 Limited English Proficiency and Language Assistant Plan. Department personnel is required to provide accurate and effective communication with members of the public regardless of their level of English proficiency. Being a LEP person should not impede someone from submitting complaints. Furthermore, the AV Stations should also brief personnel that the use of translator services is not intended to substitute their duties to assist the public in Department programs and services.

### **DEPARTMENT APPLICATIONS**

- Performance Recording and Monitoring System (PRMS), Service Comment Module
- Station/Bureau Administration Portal (SBAP) Risk Management Tracker

### **REFERENCES**

- United States Department of Justice – Los Angeles County Sheriff's Department Antelope Valley Settlement Agreement, Case Number CV 15-03174 (April 2015)
- Antelope Valley Settlement Agreement Compliance Metrics (October 2019)
- Manual of Policy and Procedures Section:
  - 3-04/010.25, Personnel Complaints (October 2014)

**Views of Responsible Officials**

On April 12, 2024, the AV Station command staff submitted a formal response to the AAB concurring with the audit results. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.



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