LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

AUDIT AND ACCOUNTABILITY BUREAU

Public Complaints Audit

Assessment of Availability and Acceptance of Complaint Information

Antelope Valley Stations

Project No. 2024-23-A

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2024

Los Angeles County Sheriff's Department
Audit and Accountability Bureau

Part I of Public Complaints Audit: Assessment of Availability and Acceptance of Complaint Information Antelope Valley Stations Project No. 2024-23-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[1] (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 Stations (AV Stations). Each of these audits addressed the different requirements of the Agreement.

OBJECTIVE, SCOPE, AND METHODOLOGY

Audit Scope and Criteria

This audit, designated as Part I, focused on assessing the complaint materials and the acceptance of complaints involving the AV Stations. Part II (the accepting complaints initiated by the public) and Part III (the investigation of complaints and management review and oversight) will be assessed in separate audits.

The auditors evaluated all the objectives in each audit, which were conducted as indicated in Table No. 1 below.

Table No. 1 – Part I Projected Due Dates and Population Time Period

Project No.	Projected Due Date	Population Time Period
Project No. 2024-2-A	March 8, 2024	February 9, 2024, to March 11, 2024
Project No. 2024-23-A	September 24, 2024	July 1, 2024, to August 15, 2024

[1] 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 Agreement Compliance Metrics (compliance metrics) provided by the AV DOJ Compliance Unit, along with additional direction provided by the AV Monitoring Team (MT).

In instances when the auditors noted the AV Stations did not initiate or accept a complaint, an Interim Audit memorandum of the potential misconduct was issued to the North Patrol Division (NPD) for their consideration and disposition. The MT considers the failure to accept a complaint as potential misconduct. Immediate attention and corrective actions[2] are essential to ensure adherence to the protocols set forth in the Agreement and to uphold public trust.

Audit Population and Sampling

For this audit, the selected time period was July 1, 2024, to August 15, 2024. The population consisted of displayed complaint informational posters, brochures, and complaint forms at the nine required LASD and non-LASD locations.

In addition, public complaints were submitted by the auditors to evaluate the adequacy of the complaint acceptance process. The auditors submitted two email complaints via the Department's website, LASD.org. Additionally, six certified mail-in complaints were sent to the AV Stations and the Professional Standards Division (PSD)[3], and 23 telephone complaints were made to the AV Stations and the Sheriff's Information Bureau (SIB)[4].

AUDIT OBJECTIVES

This audit consisted of two main objectives with a total of 8 sub-objectives.

Summary of Findings

The AV Stations were evaluated separately for each sub-objective. The results are combined to determine if they complied with the compliance metrics.

For sub-objective 1(a) – Specified Facilities, the auditors individually assessed compliance at both the AV Stations and the non-LASD locations according to the established criteria. However, the overall compliance percentage for the AV Stations also included the non-LASD locations' compliance for this objective.

Similarly, for sub-objective 2(a) – Mail-in Form, the auditors individually evaluated the compliance of the AV Stations and the PSD based on the criteria. However, the combined compliance percentage for the AV Stations included the PSD's compliance for this objective.

[2] Corrective action identifies the root cause in an incident, or a series of incidents, and describes what actions the Department has taken, or will take to mitigate the risk of a similar future incident.
[3] Per the Agreement, mail-in complaints can be submitted to PSD. If PSD Operations determines it is a complaint, the complaint will be submitted to the PSD's Internal Affairs Bureau (IAB) for distribution to the AV Stations.
[4] SIB is responsible for accepting telephone complaints on the Department's 800 Number.

Table No. 2 below presents the audit findings based on the AV Stations' compliance and associated compliance metrics.

Table No. 2 – Summary of Compliance Metrics Findings

Objective No.	Audit Objectives	Lancaster %	Palmdale %	AV Total	Compliance Metrics %
1	**AVAILABILITY OF COMPLAINT INFORMATION**				
1(a)	*Specified Facilities*	100%	100%	100%	100%
1(b)	*Community Groups*	N/A	N/A	N/A	100%
1(c)	*Department Website*			100%	100%
1(d)	*Station Websites*	100%	100%	100%	100%
2	**ACCEPTING PUBLIC COMPLAINTS**				
2(a)	*Mail-in Form*	100%	50%	67%	100%
2(b)	*Email Complaints*	100%	100%	100%	100%
2(c)	*Department 800 Number*			86%	100%
2(d)	*AV Station Phones*				
	• *Calls transferred to supervisor without unnecessary delay*	75%	88%	81%	100%
	• *Supervisor's willingness to accept the complaint*	71%	86%	79%	100%

Detailed Findings

This report will provide detailed information on the findings noted during the audit for all sub-objectives.

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.

Objective No. 1(a) – Specified Facilities

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraph 124 and 125 (partial) (October 2019), Section 3A, 3B, and 3C states:

> 3. *LASD will be deemed in substantial outcomes compliance when it:*
>
> A. *Displays approved informational materials, including LASD's "Procedures for Public Complaints" brochures (includes a complaint form) in English and Spanish and posters, which inform the public about LASD's process for filing public complaints.*
>
> B. *Ensures that the below locations have informational materials "Procedures for Public Complaints" brochures readily available for the public when the location is operable.*
>
> 1. *Lancaster Station Lobby*
> 2. *Lake Los Angeles Library*
> 3. *Lancaster Library*
> 4. *Quartz Hill Library*
> 5. *Michael Antonovich Antelope Valley Court House (at the Sheriff's public counter)*
> 6. *Antelope Valley Juvenile Court (at the Sheriff's public counter)*
> 7. *Palmdale Station Lobby*
> 8. *Littlerock (County) Library*
> 9. *Acton/Agua Dulce (County) Library*

*C. Upon inspection, **no more than one** of the operable locations listed 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

The auditors visited the specified locations to verify whether the required informational materials, including LASD's "Procedures for Public Complaints" brochures, complaint forms, and informational posters were displayed in both English and Spanish. The auditors took photographs of the complaint-related materials at each site to determine if the information was clear and assessable to the public. If the required materials were not displayed at locations outside the Department's control (such as libraries and courts), the auditors confirmed whether LASD had documented a reasonable effort to display the materials within the past 30 days through the Watch Commander's Log in the Station/Bureau Administration Portal[5] (SBAP).

The Lancaster locations are:

- Lancaster Station Lobby
- Lake Los Angeles Library
- Lancaster Library
- Quartz Hill Library
- Michael Antonovich Antelope Valley Court House
- Antelope Valley Juvenile Court

The Palmdale locations are:

- Palmdale Station Lobby
- Littlerock Library
- Acton/Agua Dulce Library

[5] The SBAP is a data entry system designed to collect and track data related to risk management incidents, which are primarily used at a station level. The system includes data on Uses of Force, Traffic Collisions, Public Comments, Pursuits, Administrative Investigations, Shots Fired, Employee Injuries, and Lawsuits & Civil Claims.

Findings

For the AV Stations combined, all nine locations (100%) met the criteria for this objective, as each location had the required informational materials, including LASD's "Procedure for Public Complaints" brochures, complaint forms, and informational posters, displayed in both English and Spanish.

For Lancaster, all six locations (100%) had the necessary informational materials including LASD's "Procedure for Public Complaints" brochures, complaint forms, and informational posters, displayed in English and Spanish.

Similarly, all three (100%) Palmdale locations had the required informational materials, including LASD's "Procedure for Public Complaints" brochures, complaint forms, and informational posters, displayed in English and Spanish.

Recommendations

There are no recommendations because the AV Stations met the compliance requirements for this objective.

Objective No. 1(b) – Community Groups

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraph 124 and 125 (partial) (October 2019), Section 3E states:

> *E. Informational materials are made available to community groups on request.*

Procedures

The auditors reviewed the AV Stations' Community Advisory Committee (CAC) meeting agenda and minutes for the audit period. In addition, the auditors reviewed Facebook posts from the CAC's webpage and contacted the AV Stations' liaison to determine if community groups requested informational materials and whether those requests were fulfilled.

Furthermore, the auditors inquired with members of each AV Stations' CAC to determine whether complaint materials were made available to the CAC or community groups upon request.

Findings

There were no requests (N/A) for complaint information material made by the community groups for the AV Stations. Therefore, this objective is not applicable.

Recommendations

There are no recommendations because the criteria were not applicable to the population for this objective.

Objective No. 1(c) – Department Website

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraph 124 and 125 (partial) (October 2019), Section 3D states:

> *D. **At all times**, complaint material is available on LASD-AV station websites.*

Procedures

The auditors reviewed the Department's website (LASD.org) to access public complaints and commendation information available under the "Contact Us" drop-down menu. The auditors verified whether the public complaint information was accessible in both English and Spanish. To view the information in Spanish, the auditors used the drop-down language menu or clicked the Spanish link provided on the webpage.

Findings

The Department (100%) met the criteria for this objective because complaint information was available in both English and Spanish on the Department's website. However, the auditors noted when selecting the Spanish language option, the complaint information converted to Spanish, but the complaint form itself remained in English. The Spanish version of the complaint form must be manually selected because it does not automatically convert from English to Spanish. After the auditors contacted the Technology and Support Division (TSD) regarding this issue, TSD updated the database to allow the form to auto-populate in Spanish when the user selects the Spanish language option. The auditors confirmed the form successfully auto populated on the website.

Additionally, the auditors noted the "I'm not a robot" box did not convert to Spanish. According to TSD, this is not possible because the Completely Automated Public Turing test to tell Computers and Humans Apart[6] (CAPTCHA) auto-generates in the preferred language of the user's browser. To view the CAPTCHA in Spanish, users must change their browser language settings, which will then translate the text to "No soy un robot" and convert the entire website to Spanish. The auditors adjusted their web browser's language settings to Spanish and confirmed the text successfully translated to Spanish.

[6] The Completely Automated Public Turing test to tell Computers and Humans Apart (CAPTCHA) refers to a type of challenge-response test used in computing to determine whether the user is human in order to deter bot attacks and spam.

Recommendations

There are no recommendations because the Department met the compliance requirements for this objective.

Objective No. 1(d) – Station Websites

Criteria

Antelope Valley Settlement Agreement Compliance Metrics, Personnel Complaints, Public Access to Complaint Information, Paragraph 124 and 125 (partial) (October 2019), Section 3D states:

> *D. **At all times**, complaint material is available on LASD-AV station websites.*

Procedures

The auditors reviewed the Department's website (LASD.org) and navigated to the "Your LASD" tab to find the drop-down menu for Lancaster Station and Palmdale Station. The auditors accessed the "Contact Us" tab to locate public complaints and commendations information and verified whether this information was available in both English and Spanish. To view the information in Spanish, the auditors used the drop-down language menu or clicked on the Spanish link provided on the webpage.

Findings

For the AV Stations combined, all (100%) met the criteria for this objective, as public complaint information was available in both English and Spanish on the AV Stations' websites (LASD.org/Lancaster and LASD.org/Palmdale).

For Lancaster Station, (100%) met the criteria for this objective because public complaint information was available in both English and Spanish.

For Palmdale Station, (100%) met the criteria for this objective because public complaint information was available in both English and Spanish.

As noted in Objective No. 1(c) – Department Website, when selecting the Spanish language option on LASD.org, the complaint information converted to Spanish, but the complaint form itself remained in English. The Spanish version of the complaint form must be manually selected because it does not automatically convert from English to Spanish. After the auditors contacted the Technology and Support Division (TSD) regarding this issue, TSD updated the database to allow the form to auto-populate in Spanish when the user selects the Spanish language option. The auditors confirmed the form successfully auto populated on the website.

Additionally, the auditors noted the "I'm not a robot" box did not convert to Spanish. According to TSD, this is not possible because CAPTCHA auto-generates in the preferred language of the user's browser. To view the CAPTCHA in Spanish, users must change their browser language settings, which will then translate the text to "No soy un robot" and convert the entire website to Spanish. The auditors adjusted their web browser's language settings to Spanish and confirmed the text successfully translated to Spanish.

Recommendations

There are no recommendations because the AV Stations met the compliance requirements for this objective.

Objective No. 2 – Accepting Public Complaints

This objective evaluated the acceptance of public complaints as specified in the compliance metrics.

Objective No. 2(a) – Mail-in Form

Criteria

There are no applicable compliance metrics for this sub-objective. However, Paragraph 125 of the Agreement 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.*"

According to the proposed draft of the Service Comment Report Handbook[7] (August 2022), within five business days of receiving a complaint, the unit's Operations staff shall mail an acknowledgment letter to the reporting party. This letter acknowledges the complaint was received by the unit. The letter shall be sent regardless of whether the complaint was made in person, by telephone, electronically, or by mail.

The Department's mail-in form can be completed and mailed to any Sheriff's station or to:

LASD Professional Standards Division
211 West Temple Street
Los Angeles, CA 90012

Procedures

To best evaluate the process in which mail-in complaints are accepted, the auditors submitted complaints in both English and Spanish to the AV Stations and the PSD to verify whether the mail-in complaint forms were received and if the Department initiated contact with the complainant within five business days of receipt. Each AV Station and the PSD received one mail-in complaint form in Spanish and one in English, totaling six mail-in complaint forms. These forms included the complainant's contact information, the location or general area of the incident, a vague description of the involved employee, and a summary of the complaint.

[7] Proposed draft SCR Handbook, revised 08/01/2022.

The auditors obtained the mailing address for the AV Stations and PSD from the Department's website, LASD.org. The auditors sent the mail-in complaint forms through the United States Postal Services certified mail, retaining copies of the complaints and certification receipts. The complaints were tracked using the tracking number on the receipt, and the auditors periodically checked the delivery status. The auditors documented the date of the complaint, as well as when the AV Stations and PSD received and responded to the mail-in complaint forms.

If no response was received, the auditors reviewed the Performance Recording and Monitoring System[8] (PRMS) to check whether a Watch Commander Service Comment Report (WCSCR) had been initiated for the mail-in complaints and reviewed the Watch Commander's Log for any entries regarding the status of the complaint.

Findings

For the AV Stations and PSD combined, four (67%) of the six mail-in complaints met the criteria for this objective because the mail-in form was received, and contact was initiated within five business days of receipt.

For Lancaster Station, all (100%) met the criteria for this objective because the mail-in complaint forms were received, and contact was initiated within five business days of receipt.

For Palmdale Station, one (50%) met the criteria for this objective because the Spanish mail-in complaint form was received, and contact was initiated within five business days of receipt. The remaining one (50%) did not meet the criteria for this objective. The English mail-in complaint form was received. However, the Station has not initiated contact with the complainant. The auditors verified in PRMS if the complaint was received and verified in the Watch Commander's Log if an entry on the status of the complaint was made.

For the PSD, one (50%) met the criteria for this objective. The Spanish mail-in complaint form was received, and contact was initiated within five business days of receipt. The remaining one (50%) did not meet the criteria for this objective. The English mail-in complaint form was received by the PSD and submitted to Lancaster Station four days beyond the required timeframe.

[8] The PRMS is a web-based application that systematically records data relevant to incidents involving Uses of Force, Shootings, and Commendations/Complaints regarding Sheriff's Department personnel. In addition, PRMS tracks the progress of Administrative Investigations, Civil Claims & Lawsuits, Discovery Motions, Employee Commendations, Preventable Traffic Collisions, Custody Complaints, and Special Conditions that the Department handles.

Specifically:

P[9]-2: Palmdale Station has not initiated contact with the complainant regarding the English mail-in complaint form. The auditors verified in PRMS whether the complaint was received and verified in the Watch Commander's Log to confirm if an entry regarding the status of the complaint was made. However, no entries were noted.

PSD[10]-2: The PSD received the English mail-in complaint form. A WCSCR was initiated, and the complaint was entered into PRMS. A memo was also issued to the Lancaster Station Captain to inform them of the complaint. However, the auditors noted the PSD provided the mail-in complaint form to Lancaster Station four days beyond the required timeframe. Lancaster Station received the complaint after the end of the audit period and were informed by the auditors the complaint was part of the audit and, at that point, a response was not required.

Recommendations

If the Department provides mail-in complaint forms as an option for the community to report issues, the AV Stations and the PSD must ensure these forms are accepted and contact is initiated with the complainant. The AV Stations and the PSD should review and update their existing protocols to ensure mail-in complaint forms are properly received and routed to the appropriate station or unit upon receipt of the mail-in complaint. It is recommended the AV Stations and PSD establish a tracking system for public complaints submitted to various locations. This system should log and distribute the complaints to the appropriate party within the Department.

Additionally, it is recommended the PSD email a copy of the mail-in complaint form and the WCSCR to the relevant stations, along with sending the original copy through county mail. This will help ensure the complaint is investigated within the required five business day timeframe. Furthermore, it is recommended that any Department member who fails to accept a complaint receive documented corrective action.

Lastly, it is recommended the Department revise MPP Section 3-09/004.00 - Limited English Proficiency (LEP) and Language Assistance Plan (April 8, 2018). The current policy requires complaint documents to be accessible to LEP individuals. However, it does not require the Department to respond to LEP complainant inquiries in the language submitted by the complainant. To better service the LEP community and address their concerns regarding the Department efficiently and effectively, the Department shall ensure all complaints are responded to in the language submitted by the complainant. This can/may be accomplished through the use of compensated bilingual Department personnel, certified interpreters, or translation services currently available to the Department.

[9] P refers to Palmdale Station. The number represents the sample being referred to of those reviewed by Palmdale Station.
[10] PSD represents the sample being referred to of those reviewed by the PSD.

Objective No. 2(b) – Email Complaints

Criteria

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

> A. ***At all times**, LASD's telephone and internet systems allow for acceptance of personnel complaints via telephone, fax, and email.*

Procedures

To best evaluate the process in which email complaints are accepted, the auditors submitted an email complaint, in English, to Lancaster Station and another email complaint, in Spanish, to Palmdale Station via the Department's email web portal on LASD.org, to assess whether the complaints were accepted and whether the AV Stations initiated contact with the complainant. The complaints included the complainant's contact information, the location or general area of the incident, a description of the involved employee and a brief summary of the complaint. The auditors documented the date the complaint was submitted and when the AV Stations received and responded to the email. In addition, the auditors also observed questions 11 and 12 on the Spanish complaint form were in English. The auditors contacted the TSD to inquire if this issue can be addressed. The TSD has since updated the database to reflect the correct language on the complaint form.

Findings

For the AV Stations combined, both (100%) emails met the criteria for this objective, as the complaint was accepted, and the Department initiated contact with the complainant.

For Lancaster Station, the one (100%) email met the criteria for this objective, as the Spanish complaint was accepted, and contact was initiated.

For Palmdale Station, the one (100%) email met the criteria for this objective, as the English complaint was accepted, and the Department initiated contact with the complainant.

Recommendations

There are no recommendations because the AV Stations met the compliance requirements for this objective. In addition, questions 11 and 12 on the Spanish complaint form were corrected on the database.

Objective No. 2(c) – Department 800 Number

Criteria

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

> A. ***At all times**, LASD's telephone and internet systems allow for acceptance of personnel complaints via telephone, fax, and email.*

Procedures

To best evaluate the process of handling complaints via the Department's 800 telephone number (800-698-TALK), the auditors called the number in both English and Spanish. During these calls, the auditors did not identify themselves or provide any information that could affect the validity of the test. The calls were made randomly over several days, including weekdays and weekends, covering all three shifts (AM, PM, and EM). For the Spanish-language calls, the auditors also noted whether translation services were offered if the call-taker did not speak the same language as the caller, to help facilitate the complaint intake process.

The auditors reviewed the recordings on the Department's NICE Inform[11] database to verify the calls were accepted. If a complaint call was not accepted or there were delays, the auditors checked the NICE Inform database for other calls, such as 9-1-1 calls, that might have impacted the AV Stations' ability to respond to the auditor's complaint calls.

Findings

Of the seven calls made to the Department's 800 Number, six (86%) met the criteria for this objective, as the call-taker accepted the complaint. The remaining one call (14%) did not meet the criteria for this objective because the call-taker did not facilitate the acceptance of the complaint.

Specifically:

SIB-5: The auditors made a call in English to the Department's 800 Number on PM Shift (1400-2200) requesting to speak with someone who could accept a complaint. The desk personnel informed the caller the supervisor "stepped out" and suggested to call back in 15 to 20 minutes.

The auditors also noted not all calls were accepted in a timely manner. For example, the auditors observed during a Spanish call placed to the Department's 800 Number on AM Shift (0600-1400), the caller was on hold for 17 minutes before the watch commander answered the call.

[11] The NICE Inform is an online audio storage system used to archive incoming and outgoing calls (with additional capabilities).

Recommendations

Since contacting the Department by telephone is a common way for community members to request assistance, the Department must ensure the community's concerns are promptly addressed when they use this resource. It is recommended the Department conduct a weekly internal audit of the telephone call logs to identify phone complaints and determine whether they were accepted and processed. The documentation of the weekly audit should be reviewed and approved by the Unit Commander.

Additionally, it is recommended the Department train staff to avoid leaving complainants on hold for extended periods if a supervisor is unavailable to take the call. Instead, staff should request the complainant's contact information for a callback.

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

To best evaluate the process for accepting complaints made via telephone, the auditors called the public telephone number listed on each AV Station's website. During these calls, the auditors did not identify themselves or provide any information that could compromise the validity of the test. The calls were made randomly, in both English and Spanish, over several days, including both weekdays and weekends, and covered all three shifts (AM, PM, and EM).

The auditors contacted the front desk, requested to make a personnel complaint, and waited for the transfer to a supervisor without unnecessary delay. If successfully connected to a supervisor, the auditors (callers) asked for the supervisor's name, stated they wanted to file a complaint against a deputy, and inquired if the supervisor could assist them. If the supervisor was willing to assist with the complaint over the telephone, the auditor would then cite an excuse to end the call. For the calls made in Spanish, the auditors also noted whether they were offered translation services to facilitate the complaint intake process.

The auditors reviewed the recordings on the Department's NICE Inform database to evaluate whether the AV Stations referred the complaint to a supervisor without unnecessary delay and if the supervisor was willing to accept the complaint. If a complaint call was not accepted or there were delays, the auditors checked the NICE Inform database for other calls, such as 9-1-1 calls, that might have impacted the AV Stations' ability to respond to the auditors' complaint calls.

Calls Transferred to Supervisor without Unnecessary Delay

Findings

For the AV Stations combined, 13 (81%) out of the 16 calls met the criteria for this objective, as the calls were transferred to a supervisor without unnecessary delay.

For Lancaster Station, six (75%) out of the eight calls met the criteria for this objective because the calls were transferred to a supervisor without unnecessary delay. The remaining two calls (25%) did not meet the criteria for this objective because the calls were not transferred to a supervisor without unnecessary delay.

For Palmdale Station, seven (88%) out of the eight calls met the criteria for this objective because the calls were transferred to a supervisor without unnecessary delay. The remaining one call (12%) did not meet the criteria for this objective because it was not transferred to a supervisor.

Specifically:

L-1: The auditors called Lancaster Station on AM Shift (0600-1400) in English requesting to speak to a supervisor who could take a complaint. The desk personnel attempted to transfer the call to the watch commander's line. However, the call was redirected back to the desk. The desk personnel provided the caller with the watch commander's direct telephone number instead of obtaining the caller's contact information.

L-3: The auditors called Lancaster Station on AM Shift (0600-1400) in Spanish requesting to speak to a supervisor who could take a complaint. During the call, it took approximately 52 minutes for the complainant to be able to speak to the watch commander. The call was transferred multiple times between several desk personnel, including one who spoke Spanish. On two occasions, the desk personnel attempted to transfer the call to the watch commander while the interpreter was on the line but were unable to connect the call successfully. The caller remained on the line and did not disconnect from the call. In addition, the desk personnel had to contact the watch commander for guidance on how to handle a Spanish speaking complainant. The watch commander instructed them to involve an interpreter. Eventually, the desk personnel transferred the call to the watch commander without an interpreter, prompting the watch commander to contact an interpreter to properly assist in taking the complaint.

P-5: The auditors called Palmdale Station on PM Shift (1400-2200) in Spanish requesting to speak to a supervisor who could take a complaint. The Station's operator did not understand the language and transferred the call to the desk personnel after the caller spoke in broken English. The desk personnel obtained a Spanish interpreter and informed the caller that a supervisor who spoke Spanish was not available during that shift to take their complaint and mentioned a supervisor would be available during the

next shifts.

Additionally, during an English call placed to Palmdale Station on EM Shift (2200-0600) the caller was on hold for 35 minutes. However, when the watch commander answered, they were very apologetic and were willing to take the complaint.

Supervisor's Willingness to Accept the Complaint

Of the 16 calls reviewed, the auditors evaluated 14 for this section. The remaining two calls were not applicable because the desk personnel did not transfer the complaint calls to a supervisor, as detailed in the findings section above.

For the AV Stations combined, 11 (79%) out of the 14 calls met the criteria for this objective, as the supervisor was willing to accept the complaint.

For Lancaster Station, five (71%) out of the seven calls met the criteria for this objective because the supervisor was willing to accept the complaint. The remaining two calls (29%) did not meet the criteria for this objective, as the supervisor was unwilling to accept the complaint.

For Palmdale Station, six (86%) out of the seven calls met the criteria for this objective because the supervisor was willing to accept the complaint. The remaining one call (14%) did not meet the criteria for this objective because the supervisor was unwilling to accept the complaint.

Specifically:

L-2: The auditors called Lancaster Station on AM Shift (0600-1400) in Spanish requesting to speak to a supervisor who could take a complaint. The desk personnel contacted a Spanish interpreter and took the caller's name and number and advised a watch commander would call them back. The call was returned to the complainant; however, the caller did not leave a message. The auditors reviewed the call made to the complainant in NICE Inform. Per the recording on the callback, the caller heard the complainant's greetings message, but as previously mentioned, did not leave a message.

L-6: The auditors called Lancaster Station on PM Shift (1400-2200) in English requesting to speak with a supervisor who could take a complaint. The desk personnel transferred the call to a sergeant, who informed the caller the watch commander was in briefing, and they would need to call back in 20 minutes. The sergeant is a supervisor and should have taken the complaint.

P-3: The auditors called Palmdale Station on AM Shift (0600-1400) in Spanish requesting to speak with a supervisor who could take a complaint. The desk personnel transferred the call to the watch commander, who advised the caller they did not speak Spanish and did not obtain translation services to facilitate the complaint.

Based on the above findings for L-6 and P-3, the AAB authored an Interim Audit memorandum and submitted it to North Patrol Division for their consideration and disposition.

Recommendations

Community members commonly contact the AV Stations via telephone to voice their issues to a supervisor. If a community member's call is not returned or handled inappropriately, 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 accept public complaints and are making concerted efforts to return telephone calls to complainants. Watch commanders should also document all phone complaints and returned calls in the Watch Commander's Log for accountability and any necessary follow-up.

It is also recommended the AV Stations establish a protocol to conduct a weekly internal audit of the Watch Commander's 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's Unit Commander.

The AAB also recommends the AV Stations train staff to avoid leaving complainants on hold for an extended period of time if a supervisor is unavailable to take the call or when obtaining translation services. Department members should instead request the complainant's contact information for a callback.

Lastly, it is recommended AV Stations brief personnel on MPP 3-09/004.00 LEP. Department personnel are required to provide accurate and effective communication with members of the public regardless of their level of English proficiency.

CONCLUSION

The auditors noted the accessibility of complaint information at the required locations and on the Department's website and each of the AV Station's websites, as well as the acceptance of complaints submitted through the Department's web portal, LASD.org. As a result, the AV Stations have effectively applied the procedures mandated by the Agreement for these sub-objectives.

The audit also identified areas where improvement is needed such as the acceptance of mail-in complaint forms. The AV Stations and the PSD received their lowest combined compliance rate of 67%, respectively, for this sub-objective. This underscores the importance of accepting and initiating public complaints that are submitted by the community.

Although Department members generally understand the complaint acceptance process, there appears to be gaps in effectiveness that suggest room for improvement. By identifying and addressing these inconsistencies within the existing framework, the Department can enhance its overall approach to managing public complaints and improve its responsiveness and efficiency.

The AAB believes addressing the findings and implementing the recommendations will help ensure prompt corrective actions for all sub-objectives which are out of compliance. This may improve the AV Station's overall compliance with the Department policies, the stipulations set forth in the Agreement, and the compliance metrics.

SUMMARY OF RECOMMENDATIONS

The purpose of this section is to provide a concise reference for all recommendations aimed at improving compliance with the AV Settlement Agreement and Department policies and procedures. The recommendations listed below are the same as those detailed in the above report.

Objective No. 2 – Accepting Public Complaints

a) **Mail-in Form:** If the Department provides mail-in complaint forms as an option for the community to report issues, the AV Stations and the PSD must ensure these forms are accepted and contact is initiated with the complainant. The AV Stations and the PSD should review and update their existing protocols to ensure mail-in complaint forms are properly received and routed to the appropriate station or unit upon receipt of the complaint. It is recommended the AV Stations and PSD establish a tracking system for public complaints submitted to various locations. This system should log and distribute the complaints to the appropriate party within the Department.

   Additionally, it is recommended the PSD email a copy of the mail-in complaint form and the WCSCR to the relevant stations, along with sending the original copy through county mail. This will help ensure the complaint is investigated within the required five business day timeframe. Furthermore, it is recommended that any Department member who fails to accept a complaint receive documented corrective action.

   Lastly, it is recommended the Department revise MPP Section 3-09/004.00 - Limited English Proficiency (LEP) and Language Assistance Plan (April 8, 2018). The current policy requires complaint documents to be accessible to LEP individuals. However, it does not require the Department to respond to LEP complainant inquiries in the language submitted by the complainant. To better service the LEP community and address their concerns regarding the Department efficiently and effectively, the Department shall ensure all complaints are responded to in the language submitted by the complainant. This can/may be accomplished through the use of compensated bilingual Department personnel, certified interpreters, or translation services currently available to the Departmental.

c) **Department 800 Number:** Since contacting the Department by telephone is a common way for community members to request assistance, the Department must ensure the community's concerns are promptly addressed when they use this resource. It is recommended the Department conduct a weekly internal audit of the telephone call logs to identify phone complaints and determine whether they were accepted and processed. The documentation of the weekly audit should be reviewed and approved by the Unit Commander.

   Additionally, it is recommended the Department train staff to avoid leaving complainants on hold for extended periods if a supervisor is unavailable to take the call. Instead, staff should request the complainant's contact information for a callback.

d) **AV Station Phones:** Community members commonly contact the AV Stations via telephone to voice their issues to a supervisor. If a community member's call is not returned or handled inappropriately, 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 accept public complaints and are making concerted efforts to return telephone calls to complainants. Watch commanders should also document all phone complaints and returned calls in the Watch Commander's Log for accountability and any necessary follow-up.

   It is also recommended the AV Stations establish a protocol to conduct a weekly internal audit of the Watch Commander's 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's Unit Commander.

   The AAB also recommends the AV Stations train staff to avoid leaving complainants on hold for an extended period of time if a supervisor is unavailable to take the call or when obtaining translation services. Department members should instead request the complainant's contact information for a callback.

   Lastly, it is recommended AV Stations brief personnel on MPP 3-09/004.00 LEP. Department personnel is required to provide accurate and effective communication with members of the public regardless of their level of English proficiency.

COMPREHENSIVE REVIEW

The AAB will conduct a comprehensive review of the findings noted during the two individual audits (2024-2-A, and 2024-23-A) conducted for the Public Complaints Audit Part I. The comprehensive review will provide an analysis of the AV Stations' performance for each sub-objective over the course of the two audits. The review will demonstrate the areas where the AV Stations met the compliance metrics and displayed continuous progression, as well as the areas requiring further enhancement. Data patterns and trends will also be identified.

This review will assist the AV Stations in optimizing Operations, mitigating risks, and progress toward fulfilling the requirements of the Agreement. A comprehensive review will be issued immediately following this Public Complaints Audit.

FOLLOW-UP PROCEDURES

Within 60 days of distributing the comprehensive review to the Division and AV Stations, the AAB will conduct a follow-up of the recommendations and verify if the auditee has made necessary improvements. Verification of corrective action will be assessed by examining new directives, amended unit orders, and/or relevant documentation. The AAB will work with the auditee in understanding the implementation of audit recommendations, as it may be a lengthy process and require a collaborative effort with other Department resources.

DEPARTMENT APPLICATIONS

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

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)
- Antelope Valley Monitoring Team Monitor's Second Audit of Community Complaints (December 2020)
- Manual of Policy and Procedures Section:
    - 3-04/010.25, Personnel Complaints (October 2014)
- Proposed Draft Service Comment Report Handbook (August 2022)

Views of Responsible Officials

On August 21, 2024, the PSD's Internal Affairs Bureau submitted a response to AAB concurring the findings. On August 28, 2024, SIB submitted a response concurring with the findings. On September 6, 2024, Lancaster Station command staff submitted a response concurring with some of the findings. On September 10, 2024, Palmdale Station command staff submitted a response concurring with the findings. The AAB presented the final audit report to the Division Director, Office of Constitutional Policing.

10/10/24

GEOFFREY N. CHADWICK DATE
Captain
Audit and Accountability Bureau
Los Angeles County Sheriff's Department