Performance Audit of San Francisco Police Department Overtime

Prepared for the

Board of Supervisors
of the City and County of San Francisco

by the

San Francisco Budget and Legislative Analyst

December 12, 2024

CITY AND COUNTY OF SAN FRANCISCO
BOARD OF SUPERVISORS
BUDGET AND LEGISLATIVE ANALYST

1390 Market Street, Suite 1150, San Francisco, CA 94102 | (415) 552-9292

December 12, 2024

Supervisor Dean Preston, Chair, Government Audit and Oversight Committee
and Members of the San Francisco Board of Supervisors
Room 244, City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

Dear Supervisor Preston and Members of the Board of Supervisors:

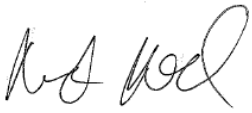
The Budget and Legislative Analyst is pleased to submit this *Performance Audit of San Francisco Police Department Overtime*. In response to a motion adopted by the Board of Supervisors in June 2023 (Motion M23-082), the Budget and Legislative Analyst conducted this performance audit, pursuant to the Board of Supervisors powers of inquiry as defined in Charter Section 16.114 and in accordance with U.S. Government Accountability Office (GAO) standards, as detailed in the Introduction to the report.

The performance audit contains 5 findings and 30 recommendations, of which 29 are directed to the Chief of Police of the San Francisco Police Department and one is directed to the Board of Supervisors. The Executive Summary, which follows this transmittal letter, summarizes the Budget and Legislative Analyst's findings and recommendations. The recommendations are designed to improve the Police Department's management of overtime by providing targeted strategies to improve internal controls and to make the best use of the Department's staffing resources.

The Chief of Police has provided a written response to our performance audit, attached to this report on page A-1. Of the 29 recommendations directed to the Police Department, the Department agrees with 12 recommendations, partially agrees with 14 recommendations, and disagrees with three recommendations.

We would like to thank the staff at the Police Department for the assistance they provided during the audit.

Respectfully submitted,



Nicolas Menard
Principal

cc: President Peskin
Supervisor Chan
Supervisor Dorsey
Supervisor Engardio
Supervisor Mandelman
Supervisor Melgar
Supervisor Ronen
Supervisor Safai
Supervisor Walton
Mayor Breed
Chief of Police
Clerk of the Board
City Attorney's Office
Mayor's Budget Director
Controller

TABLE OF CONTENTS

Executive Summary i

Introduction 1

1. Violations of Overtime Limits and Excessive Use of Overtime 19

2. Management of Sick and Injury-Related Leave 36

3. Management of Backfill Overtime 55

4. The Use of Overtime for Special Initiatives 70

5. Overtime Policies, Procedures, and Management Best Practices 87

Appendix A: Staffing Calculation Worksheets 100

Written Response from Department A-1

Executive Summary

The Board of Supervisors directed the Budget and Legislative Analyst's Office to conduct a performance audit of the San Francisco Police Department (SFPD)'s management and use of overtime through a motion (M23-082) passed on June 6, 2023. The scope of this performance audit includes, but is not limited to: (i) how decisions are made on deployment of officers; (ii) the use of metrics for programs with overtime use; and (iii) conformance with industry best practices. The scope of this audit covers SFPD overtime use between FY 2018-19 and FY 2022-23.

In FY 2022-23, SFPD's expenditures on overtime totaled $108.4 million across all funds. Of the $108.4 million total, $80.1 million, or 74 percent, was spent in the City's General Fund (Fund 10000). General Fund overtime is used for six primary functions: special events and backfill (also known as "extended work week"), arrests, investigations, court time, training, and other/miscellaneous. In FY 2022-23 extended work week overtime accounted for 553,421 of SFPD's total 733,823 General Fund overtime hours, or 77 percent, and extended work week overtime grew by 592 percent from FY 2018-19 to FY 2022-23. Overtime related to arrests and investigations decreased in FY 2020-21 and FY 2021-22 but effectively returned to pre-pandemic levels by FY 2022-23. FY 2022-23 court-related overtime was 25 percent lower than FY 2018-19 levels, and miscellaneous overtime was 25 percent higher. Training overtime increased from 6,203 hours in FY 2021-22 to 23,489 hours in FY 2022-23.

The parameters for overtime use and overtime compensation at SFPD are established in: (a) the Department's General Orders (DGOs), which are SFPD's formal, public directives and policies; (b) relevant Department Notices and Bulletins, which are department-wide communications that typically contain directions, special orders, or general information for SFPD employees; and (c) the Memorandum of Understanding (MOU) between the City and the San Francisco Police Officers' Association. The Police Department and the City impose various limits on the amount of overtime SFPD employees may work, typically in the form of daily, weekly, and annual caps.

Section 1: Violations of Overtime Limits and Excessive Use of Overtime

SFPD does not adequately control staff use of overtime or monitor and enforce established overtime limits. Our analysis of SFPD overtime data and applicable overtime limits, such as the maximum number of overtime hours an officer may work in a pay period or in a year, found that SFPD sworn staff regularly exceeded established overtime limits each year between FY 2018-19 to FY 2022-23. The analysis also showed that a small number of SFPD staff worked a comparatively large proportion of the Department's overtime: for example, in FY 2022-23, 209

individuals, or 12 percent of sworn staff who worked overtime, accounted for 32 percent of SFPD's total overtime hours. We also identified high users of overtime who consistently work the equivalent of 80-hour work weeks every week of the year, in some cases for multiple years in a row.

Overall, we found a lack of both internal and external accountability for overtime limit violations and excessive overtime at SFPD. The Department has not taken sufficient steps to enforce its overtime limits, and violations typically do not result in consequences or corrective action. In addition, several key Citywide overtime controls, such as annual public reporting and public hearings on overtime limit violations, did not occur between FY 2018-19 and FY 2022-23. Excessive overtime hours pose risks to public safety and officer health, may contribute to employee burnout and negatively affect morale, and may generate unnecessary financial costs for the City. SFPD must improve its oversight, reporting, and compliance with overtime policies to mitigate the risks associated with excessive overtime, including increased liability, impaired officer decision-making, and other negative health and public safety impacts

Recommendations

The Chief of the San Francisco Police Department should:

1.1 Consistently produce and distribute biweekly overtime reports with detailed information on individual and departmental overtime usage, including violations of established limits.

1.2 Implement a Department-wide, daily overtime monitoring system or dashboard to provide current information for supervisors and enable them to proactively manage overtime usage to reduce violations of established overtime limits.

1.3 Implement recommendation 5.1 to require the Overtime Compliance Unit to conduct regular audits of overtime hours worked and review whether they are justified according to SFPD policy.

1.4 Enforce administrative consequences for supervisors who approve excessive overtime without proper justification and for staff who consistently violate overtime policies.

1.5 Develop a system that requires captains to pre-schedule backfill overtime for officers, sergeants, and lieutenants to the largest extent possible.

The San Francisco Board of Supervisors should:

1.6 During its annual review of the Mayor's proposed budget for the Police Department, request the Department report on its compliance with the overtime limits established in

the Administrative Code, the number of staff who exceeded those limits, and strategies it will employ in the coming fiscal year to better control overtime.

Section 2: Management of Sick and Injury-Related Leave

Sick leave and injury-related leave used by SFPD sworn staff increased by 77 percent over the five years of our audit scope period, from 14.4 days annually per employee in FY 2018-19 to 25.5 days annually per employee in FY 2022-23. Our in-depth review of paid sick leave use in FY 2022-23 revealed potential abuse patterns, including frequent sick leave use on specific days of the week (often the first or last day of a work week), Saturdays and Sundays to avoid weekend duties, and coinciding with working voluntary 10B overtime.

Our evaluation of SFPD's sick leave management practices found that SFPD did not enforce existing absenteeism policies or adequately monitor attendance during the audit scope period, which allowed potentially improper uses of sick leave. Additionally, we found that SFPD has not adhered to key provisions of the Memorandum of Understanding (MOU) with the Police Officers' Association related to sick leave, such as conducting quarterly reviews of sick leave to determine eligibility for 10B overtime assignments. As a result, approximately 51,000 ineligible 10B overtime hours were worked by employees with high sick leave usage between 2020 and 2023. SFPD has also not convened the required Health and Safety Committee to address health and safety issues or update the Department's Injury and Illness Prevention Program.

Increases in sick leave use, potential sick leave abuse and inadequate sick leave management is directly tied to SFPD's overtime use, because as officers take more leave, SFPD must rely more on backfill overtime to cover these absences. Better management of sick leave and control of potential sick leave abuse would reduce SFPD's need for backfill overtime. SFPD should improve oversight, management, and control of sick leave in order to reduce avoidable backfill overtime and ensure that all leave is used legitimately and properly.

Recommendations

The Chief of the San Francisco Police Department should:

2.1 Enforce existing sick leave policies to ensure that supervisors consistently monitor illness- and injury-related leave usage. Supervisors should monitor employee attendance records for patterns that could indicate abuse and take corrective action where necessary.

2.2 Adhere to the provisions of the Memorandum of Understanding with the Police Officers' Association by conducting quarterly reviews of sick leave usage to determine eligibility for 10B overtime assignments. Any employee exceeding the 20-hour threshold of sick leave in the prior three months should be deemed ineligible for 10B assignments.

2.3 Establish and regularly convene the Health and Safety Committee as required by the Memorandum of Understanding with the Police Officers' Association. This committee should review and update the Injury and Illness Prevention Program at least annually, or more frequently as necessary, to address emerging health and safety risks within the Department.

2.4 Develop a process for tracking and analyzing sick leave usage patterns that includes (a) real-time monitoring of leave and potential abuse, and (b) the generation of detailed reports that can be used to inform management decisions and ensure compliance with Departmental policies.

2.5 Conduct regular internal audits of sick leave usage and management practices to ensure that policies are being followed and that any instances of non-compliance are sufficiently addressed. These audits should also assess the effectiveness of the corrective actions taken by supervisors.

2.6 Incorporate compliance with sick leave policies into performance evaluations of all sworn staff.

2.7 Negotiate with the Police Officers' Association to revise Department General Order 11.10 to make employees who used more than 40 hours of paid sick leave the previous six months ineligible to earn "fitness award" time off.

2.8 Negotiate with the Police Officers' Association to include a restriction on sworn employees' eligibility to earn holiday compensation when an employee calls out sick on the days preceding or following a holiday in the Memorandum of Understanding between the City and the Police Officers' Association.

Section 3: Management of Backfill Overtime

There are opportunities to improve SFPD's management of backfill overtime to ensure district stations have adequate patrol coverage for 911 response. Of the 197,211 backfill overtime hours recorded in FY 2022-23, 25,112 hours, or 13 percent, were worked for non-patrol activities such as foot beats, tactical deployments, and non-station field operations, and another nine percent did not have a radio code indicating the purpose of the overtime. Our analysis of backfill overtime hours and station minimum staffing levels found that SFPD's FY 2021-22 and FY 2022-23 backfill practices resulted in uneven coverage at district stations, with too much backfill overtime worked at some stations on some days and not enough worked at other stations on other days. We recommend that SFPD improve its tracking and monitoring of backfill overtime and audit the purpose and need for non-patrol backfill. Before future station watch sign-ups, Field Operations

Bureau should identify stations that regularly exceeded or failed to meet minimum staffing levels during the previous six-month period and make reasonable attempts to adjust watch staffing levels as needed. We also recommend that SFPD annually prepare a detailed patrol staffing model to calculate the needed budget for backfill overtime to ensure the budget remains an effective internal control and management tool.

SFPD officers' ability to earn compensatory time off, rather than pay, for overtime creates an ongoing and compounding staffing liability and increases the costs of overtime for SFPD and the City. SFPD's current practice permits an officer who works 10 hours of overtime to choose to earn 15 hours of compensatory time off rather than pay, which could require another officer to work 15 hours of overtime to backfill that absence. We recommend that SFPD reduce its need for backfill overtime by establishing reasonable limitations on sworn staff's ability to earn or use compensatory time off when the Department faces staffing shortages severe enough to require backfill overtime. These restrictions would not limit officers' ability to use other types of earned leave, such as vacation and holiday days.

Recommendations

The Chief of Police of the San Francisco Police Department should:

3.1 Require all bureaus and units of the Operations Division to track and report patrol backfill and non-patrol backfill overtime separately, and require all backfill overtime hours to have a radio unit code associated with the time worked.

3.2 Establish minimum staffing guidelines to backfill non-patrol assignments.

3.3 On an ongoing basis, direct the Overtime Compliance Unit to audit and review use of non-patrol backfill overtime to verify whether the use of backfill overtime was appropriate for that assignment dependent on Citywide staffing needs.

3.4 Before future station watch sign-ups, identify stations that regularly exceeded or failed to meet minimum staffing levels during the previous six-month period and make reasonable attempts to adjust station and watch staffing levels to improve patrol coverage.

3.5 Annually prepare a detailed patrol staffing model, using actual and projected sworn staffing, time off, information from station watch assignments, and the Department's annual Staffing Analysis, to calculate the appropriate backfill overtime budget for each district station and the Department overall, and include this information in the Department's annual budget presentations to the Police Commission and the Board of Supervisors.

3.6 Negotiate with the Police Officers' Association to limit sworn staff's ability to earn and use compensatory time off during six-month periods during which the Department uses overtime for patrol backfill.

3.7 Implement a flexible watch assignment pilot program and negotiate with the Police Officers' Association to allow SFPD to flexibly adjust watch assignments and re-assign officers to shifts with higher staffing needs.

Section 4: The Use of Overtime for Special Initiatives

SFPD has deployed significant police resources in designated areas to carry out targeted initiatives staffed using overtime, including the Union Square Safe Shopper Initiative, the Tenderloin Triangle Safety Plan, and Tourism Deployment. However, the Department not has not established adequate performance metrics or criteria to evaluate the effectiveness of these initiatives. SFPD does not have enough staffing to execute these initiatives using regular-duty officers, and as a result, these initiatives are one of the contributing factors in the Department's significant growth in overtime from FY 2018-19 through FY 2022-23: SFPD worked 319,945 overtime hours under the special initiatives reviewed for this report during the audit period at a total estimated cost to the General Fund of $30,824,783. During this same time period, as police presence and resources in specific areas of the City increased, other areas experienced reductions in police service: from FY 2018-19 to FY 2022-23, staffing levels at SFPD district stations have decreased and 911 response times have increased.

In addition, we reviewed the use of overtime for two special initiatives: (1) the Union Square Safe Shopper Initiative, which provides additional police staffing in Union Square to deter retail theft and other crime, and (2) the Tenderloin Triangle Initiative, which provides additional police staffing in the Tenderloin neighborhood to meet various needs. In both cases, we did not find a significant improvement in response times to 911 calls or trends in crime.

SFPD has not established criteria to (a) evaluate the effectiveness of these initiatives and whether they are worth the costs of overtime and officer fatigue; (b) guide decision-makers on appropriate levels of or need for police presence and staffing; or (c) scale down or conclude these initiatives once they have achieved their goals. SFPD should establish clear standards and criteria for allocating overtime hours to special initiatives and improve its monitoring and evaluation practices of overtime tasks that consume a significant amount of SFPD resources.

Recommendations

The Chief of the San Francisco Police Department should:

4.1 Establish clear standards and criteria for allocating overtime hours to special initiatives.

4.2 Modify the event code indexing system for Tourism Deployment and other special initiatives that correspond to frequent deployment geographic areas so that the initiatives may be properly monitored and evaluated.

4.3 Establish a monitoring and cost-effectiveness analysis procedure for overtime tasks that consume a significant amount of SFPD resources. Where appropriate and feasible, the analysis should include public safety outcomes such as calls for service, crime rates, successful prosecutions, and/or qualitative factors such as public feelings of safety.

4.4 Incorporate a review of special initiatives done on overtime into the biannual SFPD staffing analysis to determine whether baseline staffing levels for police districts should be adjusted due to routine overtime use.

Section 5: Overtime Policies, Procedures, and Management Best Practices

The overtime policies and practices of the San Francisco Police Department (SFPD) are not sufficient to limit unnecessary overtime and control potential abuse and are not fully compliant with best practices for overtime management. There is no central unit at SFPD responsible for ensuring that all SFPD overtime policies are enforced Department-wide, and overtime policy compliance is primarily handled by the commanding officers of each station or unit. Commanding officers have their own methods for monitoring overtime use under their jurisdiction, and much of this review occurs retroactively after the overtime has already been worked. Additionally, this review does not include whether the overtime hours are a justifiable use of overtime per SFPD policy. We also found through a review of a judgmental sample of 559 overtime cards that the Department-wide practice of obtaining two separate verifying and approving signatures for overtime worked was not consistently followed, which increases the risk for overtime fraud or abuse. Forty-eight out of 559 overtime cards reviewed were missing one or more required signatures, eight out of 559 cards had two of the same signatures, and 18 out of 559 cards had lieutenants or sergeants approving their own overtime.

This poor internal control environment increases the risk of overtime fraud or abuse, as well as the risk that not all of the overtime used by the Department is needed or justified. We recommend that SFPD increase oversight of overtime Department-wide by conducting regular audits of overtime hours worked, documenting pre-approval of overtime, and requiring captains to provide justification when they exceed their overtime budgets. SFPD should also evaluate the cost-effectiveness of overtime for specific tasks and functions and resume civilianization efforts to reduce overtime needs.

Recommendations

The Chief of the San Francisco Police Department should:

5.1 Direct the Overtime Compliance Unit to increase oversight of overtime Department-wide and by Police district by conducting regular audits of overtime hours worked and reviewing whether they are justified according to SFPD policy, including review of the following:

- Individual and station-level overtime limits;
- High users of overtime at the department;
- Significant or unexplained changes in overtime use when compared to similar periods of time;
- Negative impacts on unit or department budget;
- Assessment of arrest, investigation, and court time overtime to ensure it was justified; and
- Assessment of special events to ensure they were staffed appropriately.

5.2 Require approving supervisors to document, in writing, their pre-approval of all overtime hours. This documentation could include modifying the overtime card to add a pre-approval box and the signature of the approving supervisor, or requiring the approving supervisor to send a timestamped email to document in writing that the overtime was approved.

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

5.4 When the Police Department requests a supplemental appropriation for overtime expenditures, as required in Administrative Code Section 3.17, provide an update on its implementation of overtime controls and civilianization as part of the supplemental appropriation request.

5.5 Require station captains, if they exceeded their biweekly overtime budgets, to justify the circumstances that required exceeding their budget.

Introduction

The Board of Supervisors directed the Budget and Legislative Analyst's Office to conduct a performance audit of the San Francisco Police Department's management and use of overtime through a motion (M23-082) passed on June 6, 2023.

Scope

The scope of this performance audit includes the San Francisco Police Department (SFPD)'s management and use of overtime, including but not limited to: (i) how decisions are made on deployment of officers; (ii) the use of metrics for programs with overtime use; and (iii) conformance with industry best practices. The scope of this audit covers SFPD overtime use between FY 2018-19 and FY 2022-23.

Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. In accordance with these requirements and standard performance audit practices, we performed the following performance audit procedures:

- Held an Entrance Conference with representatives from the Police Department on August 10, 2023.
- Conducted interviews with SFPD management and commanding officers in the Operations, Administration, and Strategic Management Bureaus related to SFPD's management and use of overtime.
- Reviewed prior reports related to SFPD's use of overtime, including the Budget and Legislative Analyst's Office 2018 Performance Audit of the San Francisco Police Department.
- Reviewed audit reports of law enforcement overtime management and use in other jurisdictions, including but not limited to the cities of San Diego, Dallas, Berkeley, Honolulu, Oakland, and San Jose.
- Requested and reviewed the following materials from SFPD:

  - All SFPD strategic planning documents and staffing studies issued between July 1, 2018 through June 30, 2023;
  - All current SFPD policies, procedures, Department bulletins and notices, bureau orders, and documentation of internal controls and internal reporting related to overtime, as well as past materials applicable and in effect during the period from July 1, 2018 through June 30, 2023.
  - Copies of all audits, analyses, assessments, reports, evaluations, or studies (conducted by SFPD, by other City agencies including the Controller's Office and the Department of Human Resources, or by external third parties) of SFPD overtime, including the cost-effectiveness of overtime or overtime internal controls, since July 1, 2018.
  - All planning, budgetary, oversight, and operational materials related to SFPD special initiatives conducted using overtime.
  - All evaluations and assessments of SFPD special initiatives conducted using overtime.
- Analyzed SFPD payroll data between FY 2018-19 and FY 2022-23 to identify (a) the primary uses of overtime, (b) the primary causes of the increase in overtime over the audit scope period, (c) SFPD's compliance with established overtime limits, and (d) use of leave.
- Reviewed a sample of original paper overtime cards stored at SFPD Headquarters.
- Conducted targeted interviews with SFPD district station captains related to station overtime use and management of overtime.
- Conducted targeted interviews with commanding officers in charge of special initiatives related to overtime use and management of overtime.
- Submitted a draft report with findings and recommendations to the Police Department on September 18, 2024, and conducted an exit conference with SFPD representatives on October 29, 2024.
- Submitted the final draft report, incorporating comments and information provided by SFPD to us in the exit conference, to the Police Department on November 25, 2024.

San Francisco Police Department Overview

The San Francisco Police Department (SFPD) is organized into three main divisions overseen by the Chief of Police, as shown in Exhibit i.1 below. The Operations division includes SFPD's core policing and law enforcement functions: Field Operations (police district station staffing and patrol), Investigations, Special Operations, and Airport Operations. The Administration division includes training, information services, staff services, strategic communication, risk management, policy and public affairs, policy development, and labor relations. The Strategic

Management division includes SFPD's fiscal and technology units and also oversees other strategic priorities of the department such as police reform.

Exhibit i.1: Police Department Organization

Chief of Police		
Operations	**Administration**	**Strategic Management**
• Field Operations ○ District stations and patrol • Investigations ○ General Crimes, Major Crimes, Special Victims, Strategic Investigations, Forensic Services • Special Operations ○ MTA/Traffic, Tactical, UASI, Homeland Security • Airport ○ Airport Administration, Airport Patrol, Airport Traffic • Crime Strategies and Community Engagement	• Administration ○ Training, Property/Crime Information Services, Staff Services • Strategic Communication • Risk Management • Policy and Public Affairs • Policy Development • Labor Relations	• Technology • Fiscal

Source: SFPD organizational chart, September 2023.

Overtime at SFPD

The parameters for overtime use and overtime compensation at SFPD are established in: (a) the Department's General Orders (DGOs), which are SFPD's formal, public directives and policies; (b) relevant Department Notices and Bulletins, which are department-wide communications that typically contain directions, special orders, or general information for SFPD employees; and (c) the Memorandum of Understanding (MOU) between the City and the San Francisco Police Officers' Association. These documents establish the following conditions for overtime at SFPD:

- Overtime is defined as work performed in excess of an employee's normally scheduled watch or work week.
- Overtime is compensated at the rate of one-and-a-half times the employee's base hourly rate[1] for either time off or pay. Instead of paid overtime, SFPD sworn staff may request

[1] Under the federal Fair Labor Standards Act, employees must receive overtime pay for hours worked in excess of 40 hours in a workweek. The MOU between the City and the Police Officers' Association counts vacation leave and legal holidays as hours worked for overtime calculation purposes, but does not count other leaves such as sick leave towards hours worked. As a result, under the Fair Labor Standards Act, an employee who calls out sick or who otherwise does not complete a regularly-scheduled workweek does not earn the time-and-one-half rate for voluntary overtime worked later in the workweek. Any voluntary overtime worked in this scenario is paid at the employee's regular straight-time rate, until the employee reaches a total of 40 hours worked in the workweek. Once the employee reaches 40 hours worked, any subsequent overtime hours are compensated at the time-and-one-half

to earn compensatory time off at the same one-and-one-half times rate. The MOU between the City and the Police Officers' Association limits sworn staff's compensatory time off balances to 300 hours, and employees may not accumulate a compensatory time off balance in excess of this amount.

- All SFPD sworn staff below the rank of captain (police officers, assistant inspectors, sergeants, inspectors, crime scene investigations managers, and lieutenants) are eligible to earn overtime compensation or compensatory time off. Because captains are frequently required to work in excess of 40 hours per week to perform their job duties, captains receive a wage increase in lieu of earning paid overtime or compensatory time off.
- Commanding officers, division directors, and officers-in-charge are responsible for determining the necessity of overtime assignments.
- The Police Department and the City impose various limits on the amount of overtime SFPD employees may work, typically in the form of daily, weekly, and annual caps.

Overtime Expenditures

In FY 2022-23, SFPD's expenditures on overtime totaled $108.4 million across all funds. Of the $108.4 million total, $80.1 million, or 74 percent, was spent in the City's General Fund Annual Account Control, as shown in Exhibit i.2 below. Overtime spending in this fund grew by 317 percent from FY 2018-19 to FY 2022-23. Over this five-year period, the cost of one hour of overtime increased due to annual cost-of-living adjustment (COLA) increases to wages for SFPD sworn staff, which accounts for some of the increase in expenditures. Additionally, Exhibit i.2 reports actual spending on overtime, rather than overtime hours worked, and does not include overtime worked for compensatory time off (when an employee earns time off rather than overtime pay). Overtime hours worked are presented in Exhibit i.4 and subsequent exhibits beginning in the *SFPD Overtime Use, FY 2018-19 to FY 2022-23* section on the following pages.

---

rate. However, the MOU between the City and the Police Officers' Association also states that all mandatory, unscheduled overtime is calculated at the one-and-a-half overtime rate, and all mandatory overtime is paid at this rate even if the employee did not work a 40-hour workweek under the terms of the Fair Labor Standards Act.

Exhibit i.2: SFPD Overtime Actual Expenditures by Fund, FY 2018-19 to FY 2022-23

Fund	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	% Change*
GF Annual Acct. Ctrl	$19,216,737	$26,023,560	$17,571,399	$47,207,474	$80,135,395	317%
GF Annual Auth. Ctrl	1,241,264	1,576,885	1,171,343	1,045,872	0	-100%
GF Cont. Auth. Ctrl	558,587	831,925	440,717	854,324	2,096,070	275%
GF Work Order	4,504,230	4,439,820	1,627,768	2,280,041	2,620,553	-42%
Airport Op. Fund	2,095,625	1,503,904	328,234	1,337,866	4,552,111	117%
Police Law Enf. Svcs.	22,270,438	18,231,831	17,578,416	18,506,934	17,884,847	-20%
Spec. Rev. and Other	2,985,579	1,970,871	2,176,483	1,581,169	1,084,285	-64%
Total	**$52,872,460**	**$54,578,797**	**$40,894,360**	**$72,813,678**	**$108,373,261**	**105%**

Source: City financial system. The General Fund Annual Account Control fund is used for regular operating activities. The General Fund Annual Authority and Continuing Authority funds are typically used for annual or continuing projects or initiatives. The General Fund Workorder fund is used for interdepartmental services (workorders) between SFPD and other City departments, such as SFMTA. The Airport fund is used for Airport operating activities. The Police Law Enforcement Services fund is used for police services paid for by private event organizers as allowed under Administrative Code Section 10B. Special revenue funds are used for overtime paid for by grants and other non-General Fund revenue sources.

* Over this five-year period, the cost of one hour of overtime increased due to annual cost-of-living (COLA) increases to wages for SFPD sworn staff, which accounts for some of the increase in expenditures. This exhibit reports actual annual spending on overtime, rather than overtime hours worked.

As shown in Exhibit i.3 below, SFPD exceeded its General Fund Annual Account Control overtime budget in FY 2019-20, FY 2020-21, FY 2021-22, and FY 2022-23. In FY 2021-22, the Department exceeded its original budget by $32.6 million, and in FY 2022-23, it exceeded its original budget by $54.8 million. Typically, the Department's overtime is paid for by a combination of its original overtime budget and salary savings from unfilled positions.[2] However, in March 2023, the Department required a $25.4 million transfer from the City's General Reserve in order to pay for overtime spending.

[2] City Administrative Code section 3.17 states that the Police and other departments require Board of Supervisors approval to exceed their overtime budgets, regardless of whether the department has sufficient salary savings to pay for the overtime. During the COVID-19 pandemic, the Mayor's emergency orders, which were approved by the Board of Supervisors, suspended these rules.

Exhibit i.3: SFPD General Fund Overtime Budgeted and Actual Expenditures, FY 2018-19 to FY 2022-23

Fund 10000	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23
Original overtime budget	$19,218,532	$19,392,195	$12,408,532	$14,605,531	$25,354,420
Revised overtime budget	19,218,532	20,007,195	12,408,532	14,605,531	84,146,117
Overtime actuals	19,216,737	26,023,560	17,571,399	47,207,474	80,135,395
Under/overspending	***($1,795)***	***$6,631,365***	***$5,162,867***	***$32,601,943***	***$54,780,975***

Source: City financial system.

SFPD Overtime Use, FY 2018-19 through FY 2022-23

Overtime is used for six primary functions: special events and backfill (also known as "extended work week"), arrests, investigations, court time, training, and other/miscellaneous.

As shown in Exhibit i.4 below, in FY 2022-23 extended work week overtime accounted for 553,421 of SFPD's total 733,823 General Fund overtime hours, or 77 percent. (Throughout the remainder of this report, the term "General Fund overtime" will specifically refer to overtime in Fund 10000, General Fund Annual Account Control, unless otherwise specified.) Extended work week overtime, which is discussed in more detail following Exhibit i.4, includes backfill overtime, overtime worked for a special event or demonstration, and overtime worked for specific SFPD initiatives.

Extended work week overtime grew by 592 percent from FY 2018-19 to FY 2022-23. Overtime related to arrests and investigations overtime, also known as "shift extension" overtime, decreased in FY 2020-21 and FY 2021-22 but effectively returned to pre-pandemic levels by FY 2022-23. FY 2022-23 court-related overtime was 25 percent lower than FY 2018-19 levels, and miscellaneous overtime was 25 percent higher. Training overtime increased from 6,203 hours in FY 2021-22 to 23,489 hours in FY 2022-23.

Exhibit i.4: General Fund Overtime Hours by Category, FY 2018-19 to FY 2022-23

Type	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	% Change
Arrests	58,112	55,816	45,703	44,789	61,161	5%
Investigations	58,207	56,361	39,920	42,328	55,359	-5%
Ext. Work Wk.	79,983	140,945	88,445	371,723	553,421	592%
Court	38,794	23,891	22,334	21,511	28,907	-25%
Miscellaneous	9,164	8,396	5,429	7,295	11,486	25%
Training	9,223	7,740	6,555	6,203	23,489	155%
Total	**253,483**	**293,147**	**208,387**	**493,849**	**733,823**	**189%**

Source: SFPD payroll data.

Note: Overtime hours include overtime worked for pay (OT) and compensatory time off (OE), as well as overtime worked in an acting assignment (LWOT and LWOE). Fiscal year is based on the start date of the overtime shift worked.

The growth in extended work week overtime in the General Fund between FY 2018-19 and FY 2022-23 is due to increases in several types of overtime initiatives, as shown in Exhibit i.5 below. The largest single cause of the increase is backfill overtime, which increased by 197,065 hours over the five-year period, and in FY 2022-23 accounted for 36 percent of all extended work week overtime in the General Fund. As discussed later in the Introduction to this report, SFPD staffing levels have decreased between FY 2018-19 and FY 2022-23, and the Department has relied on backfill overtime to meet minimum staffing levels at district stations. According to the 2023 SFPD Staffing Analysis, citywide full-duty staffing declined by 21 percent over the five-year period from January 2019 to September 2023, from 1,868 to 1,474 full-duty sworn.

In addition to backfill overtime, the growth in extended work week overtime is due to:

- Special initiatives, including Union Square Safe Shopper, the Tenderloin Triangle initiative, and tourism deployment. These initiatives are described in *Section 4: Use of Overtime for Special Initiatives* of this report.
- Special events, demonstrations, and dignitary visits: this category of overtime covers police deployment in response to events taking place in the City. These events may be planned or unplanned and include holidays, parades, street fairs, dignitary visits, rallies, protests, demonstrations, and other citywide events. This category of overtime fluctuates significantly in response to current events: for example, in FY 2019-20, events and demonstrations related to the killing of George Floyd accounted for 65,727 of the total 87,464 special event overtime hours that year, or 75 percent.
- Other extended work week overtime: this category includes overtime associated with training, recruitment, critical incidents, range/armory time, homeless outreach, and specialized units/targeted response (foot beats, vandalism abatement, stunt driving response, etc.), as well as other types of Extended Work Week overtime that do not fall into any of the other categories in Exhibit i.5 below.

Exhibit i.5: General Fund Extended Work Week Overtime, FY 2018-19 to FY 2022-23

Type	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	*5-yr Chg.*
Backfill	146	45	740	92,282	197,211	*197,065*
Union Square Safe Shopper	0	0	0	85,117	90,344	*90,344*
Special Events, Demonstrations, Dignitary Visits	29,371	87,464	35,527	57,980	81,532	*52,161*
Violence Reduction*	0	0	0	11,142	33,774	*33,774*
Tenderloin Triangle	0	0	5,034	47,730	28,444	*28,444*
Tourism Deployment	0	0	0	34,736	28,339	*28,339*
Hospital Watch	7,669	5,753	6,361	10,595	17,960	*10,292*
COVID-19	0	13,180	5,180	267	26	*26*
Extended Work Week - Other	42,798	34,504	35,604	31,875	75,791	*32,993*
Total	**79,983**	**140,945**	**88,445**	**371,723**	**553,421**	***473,438***

Source: SFPD payroll data.

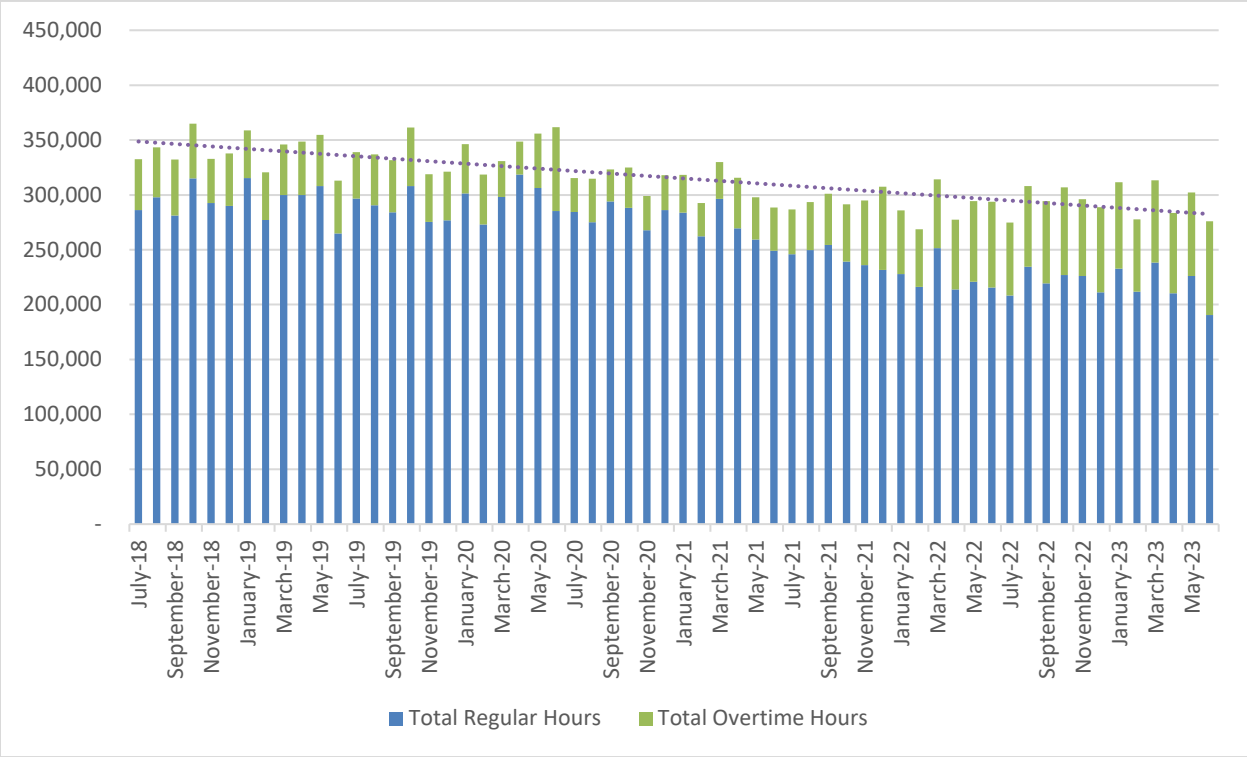
Note: Overtime hours include overtime worked for pay (OT) and compensatory time off (OE), as well as overtime worked in an acting assignment (LWOT and LWOE). Fiscal year is based on the start date of the overtime shift worked.

*Although multiple SFPD activities are conducted with an overall goal of violence reduction, the violence reduction overtime in this table is specifically associated with event code 210121.

Trends in SFPD Staffing Levels

As mentioned above, SFPD staffing levels decreased by 21 percent between FY 2018-19 and FY 2022-23, requiring the Department to rely on backfill overtime to meet minimum staffing levels at district stations. However, even with the use of backfill overtime, the total number of hours worked by SFPD sworn staff on either regular time or overtime decreased between FY 2018-19 and FY 2022-23, as shown in Exhibit i.6 below. In other words, the increase in overtime hours did not fully offset the decrease in regular worked hours, which declined as SFPD staffing levels declined.

Exhibit i.6: SFPD Sworn Regular Time and Overtime Hours, FY 2018-19 to FY 2022-23



Source: SFPD payroll data. Totals exclude hours worked by staff detailed to Airport bureaus.

Exhibit i.7 below displays the effective actual full-time equivalent (FTE) staffing levels of officers, inspectors, lieutenants, sergeants, and captains at SFPD between FY 2018-19 and FY 2022-23, based on payroll data maintained by the Controller's Office. As shown in Exhibit i.7, in FY 2022-23, SFPD had 507.79 FTE fewer officers, 55.96 FTE fewer sergeants, and 11.75 FTE fewer lieutenants compared to FY 2018-19.

Exhibit i.7: SFPD Rank and File Actual FTE Staffing Levels, FY 2018-19 to FY 2022-23

	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	Change
Officers	1,869.82	2,087.03	1,607.84	1,487.54	1,362.03	(507.79)
Inspectors	2.22	1.95	2.02	2.02	2.02	(0.20)
Sergeants	497.69	577.30	503.32	460.65	441.73	(55.96)
Lieutenants	113.31	116.03	104.16	100.63	101.56	(11.75)
Captains	27.10	28.52	26.42	26.63	27.03	(0.07)
Total	**2,510.14**	**2,810.83**	**2,243.76**	**2,077.47**	**1,934.37**	**(575.77)**

Source: "Spending – FTE" database maintained by the Controller's Office published on DataSF. FTE staffing levels are calculated using the weekly payroll processed hours by the per-pay period standard hours. The data source is the payroll module within SF People and Pay, the City's payroll system.

The figures in Exhibit i.7 above include individuals who are less than full-duty. As defined in SFPD's 2023 Staffing Analysis, full-duty staff are staff who are fully deployable, assigned to a unit and location within San Francisco (rather than the Airport), not an academy recruit, and not on medical, family, military, or disciplinary leave or temporary modified duty. According to the 2023 SFPD Staffing Analysis, citywide full-duty staffing declined by 21 percent over the five-year period from January 2019 to September 2023, from 1,868 to 1,474 full-duty sworn.

Causes of Staffing Decreases

Between FY 2018-19 and FY 2022-23, SFPD's hiring and academy class sizes were insufficient to offset Department separations, causing an overall staffing decrease during this time period. As shown in Exhibit i.8 below, the number of SFPD retirements, resignations, and terminations (excluding academy separations, which are discussed separately) peaked in FY 2021-22, with 216 total separations, and have decreased since then.

Exhibit i.8: SFPD Sworn Separations, FY 2018-19 to FY 2022-23

	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	Total
Retirements	61	47	82	129	73	392
Resignations and Terminations	25	44	36	85	50	240
Deaths	0	0	1	2	1	4
Total	**86**	**91**	**119**	**216**	**124**	**636**

Source: SFPD 2023 Staffing Analysis, page 213.

Note: Separations in this table total 636, which more than the 575.77 FTE decrease noted in Exhibit i.7. Exhibit i.7 presents the change in net FTE staffing and accounts for separations and hires that occur throughout the year. In contrast, Exhibit i.8 presents only sworn separations in headcount, rather than FTE. In other words, an officer who retires mid-way through a fiscal year would be counted as a partial FTE for the part of the year that they worked in Exhibit i.7, but one total separation in Exhibit i.8.

Over this same time period, both the number of recruits entering SFPD's academies and the number of recruits who graduate the academies and enter field training decreased, as shown in Exhibit i.9 below. (In Exhibit i.9, year is assigned based on the year of the start date of the academy.) However, since reaching recruitment lows during the COVID-19 pandemic in 2020 and 2021, SFPD's academy sizes and the number of recruits completing the academy and entering field training have increased.

Exhibit i.9: SFPD Recruits Entering and Exiting Academies, CY 2018 to 2022

	2018	2019	2020	2021	2022	2023	2024
Total entering academy	197	127	86	41	64	72	62
Total entering field training	113	93	54	27	34	40	n/a
Academy grad. rate	57.4%	73.2%	62.8%	65.9%	53.1%	55.5%	n/a

Source: SFPD. Year is assigned based on the start date of the academies. The 2024 academy classes are ongoing.

These trends in staffing levels are not unique to San Francisco: according to the Police Executive Research Forum (PERF), an independent research organization that publishes surveys and reports on policing, 55 percent of the 266 agencies that responded to an October 2022 PERF survey reported that their numbers of full-time sworn personnel declined between 2020 and 2022. In its August 2023 report *Responding to the Staffing Crisis: Innovations in Recruitment and Retention*, PERF cites the following causes of the staffing challenges facing law enforcement agencies: a strong job market, competition from other law enforcement agencies for job candidates, negative public perceptions of police, COVID-19 health risks and vaccination requirements, decreased appeal to younger workers, and large cohorts of senior officers eligible to retire. In conversations with the audit team, SFPD management indicated that many of these factors have contributed to the decrease in SFPD staffing levels as well.

Employment Incentives

In April 2023, the Board of Supervisors approved Ordinance 068-23 adopting the Memorandum of Understanding (MOU) between the City and the Police Officers' Association, which represents SFPD sworn staff at the rank of captain and below. According to the Bargaining Summary prepared by the Department of Human Resources, the terms of this MOU, effective July 1, 2023 through June 30, 2026, include base wage increases, step increases, and retention pay increases for represented employees. According to a cost analysis prepared by the Controller's Office, the wage increase terms provide for a total increase in wages of 10.75 percent over the length of the contract. The total cost of the MOU wage increases, retention pay, step adjustments, and signing bonus across all funds totals $166.5 million.

Anticipated Future Improvements in Hiring

SFPD projected in its FY 2024-25 budget that applications to the Department will continue to increase, and that admissions to the academy will yield an average of 40 new hires per class with four classes per year. Increases in wages for eligible SFPD sworn staff that took effect in June of 2023 may also contribute to future improvements in officer recruitment and retention. If the recent progress in academy recruit levels in 2023 and 2024 continues and SFPD realizes the benefits of wage increases on recruitment and retention, SFPD sworn staffing levels in future

years may improve. However, it will likely take several years before staffing levels increase sufficiently to have an effect on SFPD overtime, particularly backfill overtime. Assuming 120 separations per year and 160 new hires per year, it would take more than 16 years for the Department to return to its pre-COVID staffing levels.

Given these trends and in accordance with the audit motion M23-08, this audit report focuses on targeted strategies and recommendations to improve SFPD's oversight, management, and monitoring of overtime in the short term to improve internal controls and make the best use of the staffing resources the Department has available.

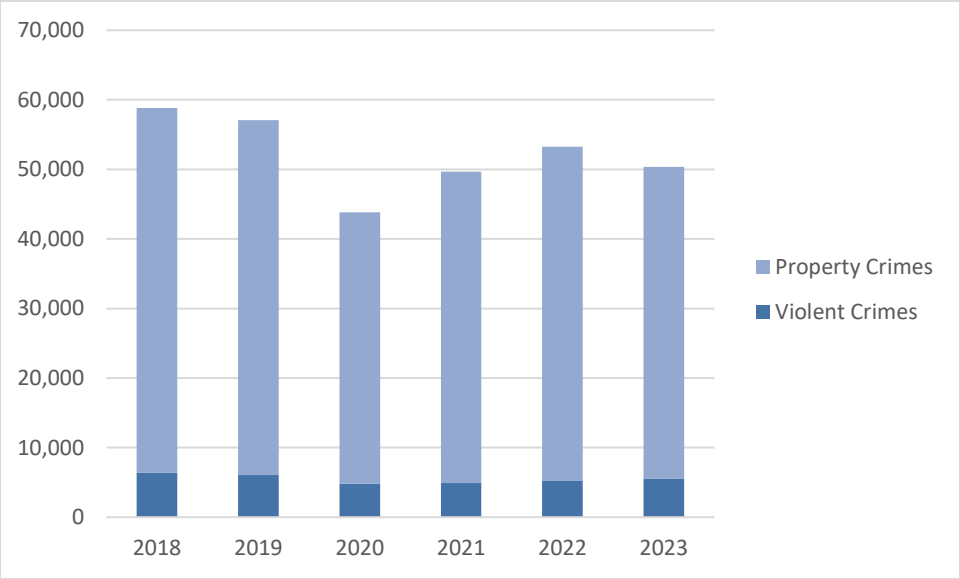
Trends in San Francisco Crime

According to its year-end CompStat report, SFPD recorded 50,382 Part 1 crimes in 2023,[3] a 14.3 percent decrease from the 58,802 Part 1 crimes recorded in 2018.[4] Approximately nine in 10 of these crimes were property crimes, a proportion that has remained virtually level for the past six years. Exhibit i.10 below shows Part 1 crimes recorded by SFPD between 2018 and 2023.

[3] On an annual basis, police departments across the country report crime and arrest data by category to the Federal Bureau of Investigation. For crime categories known as Part 1 offenses, including homicide, rape, and robbery, departments report the total number of crimes known to the department, regardless of whether an arrest has taken place. For all other crime categories, departments report arrest data only. SFPD publishes Part 1 crime data, using the same offense categories, in monthly reports available on its website. These reports, which are produced using the crime mapping software CompStat, break down crimes by police district and show year-over-year changes.

[4] Although SFPD's CompStat reports use the same crime categories as the data reported to the FBI, there are differences between the annual totals. Data retrieval dates are likely one factor in these differences, as some crimes are not reported immediately and some reports may be determined to be unfounded. Because the CompStat reports provide the ability to view crimes by police district, they are the source for all statistics and exhibits in this section.

Exhibit i.10: Total Part 1 Crimes in San Francisco, 2018 to 2023



Source: Year-to-date data from San Francisco Police Department's CompStat reports for December of each year.[5]

Violent Crime

The 5,501 Part 1 violent crimes recorded by SFPD in 2023 represented a 14.1 percent decrease from the 6,401 Part 1 violent crimes reported in 2018. However, after decreasing 20.7 percent in 2020, the number of violent crimes has increased each year since then. Exhibit i.11 below shows a breakdown of violent crimes between 2018 and 2023.

Exhibit i.11: San Francisco Part 1 Violent Crimes by Type, CY 2018 to 2023

	2018	2019	2020	2021	2022	2023	% Change
Homicide	46	41	48	56	56	54	17.4%
Rape	417	371	202	204	237	222	-46.8%
Robbery	3,208	3,083	2,387	2,242	2,370	2,734	-14.8%
Aggravated Assault	2,622	2,538	2,161	2,381	2,590	2,473	-5.7%
Human Trafficking - Sex Act	108	47	23	29	18	18	-83.3%
Human Trafficking – Invol. Serv.	0	0	0	0	1	0	n/a
Total Part I Violent Crimes	**6,401**	**6,080**	**4,821**	**4,912**	**5,272**	**5,501**	**-14.1%**

Source: Year-to-date data from San Francisco Police Department's CompStat reports for December of each year.

As shown in Exhibit i.11 above, robberies and aggravated assaults comprise the vast majority of violent crimes. The number of crimes in each of these categories decreased in 2020, as did the number of rapes. Though they have increased since then, crimes in each of these categories in 2023 remained below 2018 levels. By contrast, the number of homicides increased in 2020 amid

[5] Although these reports are published online in PDF form, SFPD shared underlying spreadsheets to facilitate our analysis.

the largest national year-over-year increase in murder in more than a century,[6,7] and yearly homicide totals have exceeded pre-pandemic levels every year since as well.

Property Crime

The 44,881 Part 1 property crimes reported by SFPD in 2023 reflected a 14.4 percent decrease from the 52,401 crimes reported in 2018. Like the number of violent crimes, the number of property crimes decreased in 2020 before increasing in 2021 and 2022. However, unlike the number of violent crimes, the number of property crimes decreased in 2023. As shown in Exhibit i.12 below, the decrease in property crime between 2018 and 2023 was driven by a decrease in larceny-theft, which accounted in each year for more property crimes than any other category. (Larceny-theft includes shoplifting, theft from vehicles, and other forms of theft). This decrease was offset by increases in burglary, motor vehicle theft, and arson.

Exhibit i.12: San Francisco Property Crimes by Type, 2018 to 2023

	2018	2019	2020	2021	2022	2023	% Change
Burglary	5,605	4,875	7,400	7,217	5,937	5,607	0.0%
Larceny Theft	42,200	41,450	25,190	31,139	35,401	32,247	-23.6%
Auto Theft	4,308	4,391	5,987	6,030	6,281	6,687	55.2%
Arson	288	285	411	387	354	340	18.1%
Total Part I Property Crimes	**52,401**	**51,001**	**38,988**	**44,773**	**47,973**	**44,881**	**-14.4%**

Source: Year-to-data data from San Francisco Police Department's CompStat reports for December of each year.

Trends in Police Workload

Calls for Service

In addition to being called for major crimes, police are also called for other disturbances, including minor crimes and incidents in which police determine no crime has been committed. Exhibit i.13 below shows total SFPD dispatched calls for service, including calls to 911, calls initiated by officers in the field (also referred to as self-initiated calls or "on-view" calls), and calls dispatched by the Healthy Streets Operation Center (HSOC). Between 2018 and 2023, the volumes of all three call types decreased, as shown in Exhibit i.13 below. The number of calls to

[6] Lucas, R. (2021, September 27). FBI data shows an unprecedented spike in murders nationwide in 2020. NPR. https://www.npr.org/2021/09/27/1040904770/fbi-data-murder-increase-2020

[7] Although explanations vary, possible factors in 2020's nationwide homicide increase include the social and economic impacts of the COVID-19 pandemic, sudden interruptions in social services, and changes in police-community relations after the murder of George Floyd in Minneapolis.

911, which excludes self-initiated on-view calls, decreased by 19 percent between 2018 and 2023.

Exhibit i.13: Dispatched Calls for San Francisco Police Department Service, 2018 to 2023

	2018	2019	2020	2021	2022	2023	Change	% Change
Call to 911	455,711	447,809	397,590	389,867	374,969	369,601	(86,110)	-19%
Self-Initiated	305,480	337,813	247,557	193,301	161,562	187,532	(117,948)	-39%
HSOC Call	9,566	10,268	4,075	936	784	8,138	(1,428)	-15%
Grand Total	770,757	795,890	649,222	584,104	537,315	565,271	(205,486)	-27%

Source: BLA analysis of San Francisco Computer-Aided Dispatch data, retrieved from DataSF. Excludes one call in 2019 and one in 2020 for which the "onview_flag" field indicated UTL and REP, respectively, which are dispositions rather than on-view indicators.

Call volume varies significantly by police district. In 2023, the district with the highest volume of calls (the Bayview district, with 72,443 calls) received more than twice the number of calls as the district with the lowest total (the Park district, with 35,106 calls). Exhibit i.14 below shows call volume by district in 2018 compared to 2023. In general, the number self-initiated calls decreased more than the number of non-self-initiated calls, except at the Bayview district where the number of self-initiated calls increased between 2018 and 2023. The number of non-self-initiated calls decreased at every district by between seven and 31 percent.

Exhibit i.14: Dispatched Calls for Service by Police District, 2018 to 2023

District		2018	2023	Change	% Change
Bayview	Self-Initiated	34,873	44,390	9,517	27%
	Non-Self-Initiated: 911 or HSOC	34,735	28,053	(6,682)	-19%
	Total	**69,608**	**72,443**	2,835	4%
Central	Self-Initiated	42,247	19,785	(22,462)	-53%
	Non-Self-Initiated: 911 or HSOC	60,031	44,505	(15,526)	-26%
	Total	**102,278**	**64,290**	(37,988)	-37%
Ingleside	Self-Initiated	16,358	8,367	(7,991)	-49%
	Non-Self-Initiated: 911 or HSOC	39,128	31,696	(7,432)	-19%
	Total	**55,486**	**40,063**	(15,423)	-28%
Mission	Self-Initiated	34,654	19,318	(15,336)	-44%
	Non-Self-Initiated: 911 or HSOC	64,658	52,168	(12,490)	-19%
	Total	**99,312**	**71,486**	(27,826)	-28%
Northern	Self-Initiated	25,822	16,451	(9,371)	-36%
	Non-Self-Initiated: 911 or HSOC	58,530	54,254	(4,276)	-7%
	Total	**84,352**	**70,705**	(13,647)	-16%
Park	Self-Initiated	26,538	14,528	(12,010)	-45%
	Non-Self-Initiated: 911 or HSOC	26,795	20,578	(6,217)	-23%
	Total	**53,333**	**35,106**	(18,227)	-34%
Richmond	Self-Initiated	19,127	9,190	(9,937)	-52%
	Non-Self-Initiated: 911 or HSOC	29,737	26,386	(3,351)	-11%
	Total	**48,864**	**35,576**	(13,288)	-27%
Southern	Self-Initiated	41,039	19,912	(21,127)	-51%
	Non-Self-Initiated: 911 or HSOC	54,297	43,496	(10,801)	-20%
	Total	**95,336**	**63,408**	(31,928)	-33%
Taraval	Self-Initiated	23,096	9,573	(13,523)	-59%
	Non-Self-Initiated: 911 or HSOC	38,482	33,222	(5,260)	-14%
	Total	**61,578**	**42,795**	(18,783)	-31%
Tenderloin	Self-Initiated	40,584	24,934	(15,650)	-39%
	Non-Self-Initiated: 911 or HSOC	46,352	31,932	(14,420)	-31%
	Total	**86,936**	**56,866**	(30,070)	-35%
Blank	Self-Initiated	1,142	1,084	(58)	-5%
	Non-Self-Initiated: 911 or HSOC	12,532	11,449	(1,083)	-9%
	Total	**13,674**	**12,533**	(1,141)	-8%

Source: BLA analysis of San Francisco Computer-Aided Dispatch data, retrieved from DataSF.

In summary, SFPD full-duty sworn staffing levels decreased by 21 percent during the audit scope period while the demand for police services has also decreased: serious crimes decreased by 14 percent and 911 calls for service, excluding self-initiated calls, decreased Citywide by 19 percent. Police overtime has fixed components, including minimum staffing for patrol sectors to ensure effective response times to 911 calls and investigating crimes in a timely manner. As noted above,

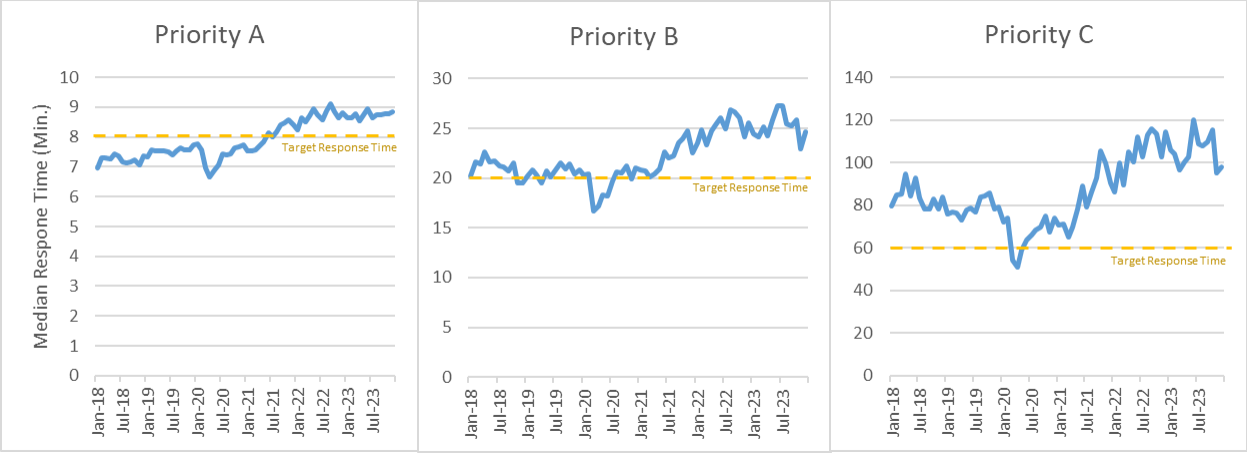
total overtime hours in the General Fund increased by 189 percent during the audit scope period, which is not proportional to the Department's decrease in staffing. However, as shown in Exhibit i.6 earlier in this report, even with a large increase in overtime, the total number of hours worked by SFPD sworn staff on either regular time or overtime decreased between FY 2018-19 and FY 2022-23.

911 Response Times

The City classifies 911 calls by priority level. **Priority A** calls relate to immediate danger to individuals: when there is present or imminent danger to life, major property damage, and/or suspect(s) of significant crimes may be in the area; when a major crime scene must be protected; when a juvenile is missing or involved in sexual abuse or assault; and when an elderly person is missing. **Priority B** calls cover potential property damage, a nearby suspect, or a crime that was just committed. **Priority C** calls cover situations that do not present danger to individuals or property.

The City's target median response times for Priority A, Priority B, and Priority C calls are eight, 20 and 60 minutes, respectively.[8] City data shows that median response times (the interval between a 911 call being received and the first law enforcement unit arriving on scene) have increased across call priority categories in recent years. As shown in Exhibit i.15 below, 911 response times are above the City's target for all three priority levels.

Exhibit i.15: 911 Response Times, 2018 to 2023



Source: San Francisco Public Safety scorecard.

[8] San Francisco Office of the Controller. *San Francisco Police Department: Response Time Performance and Targets.* December 3, 2019.

Clearance Rates

San Francisco clearance rates decreased between 2018 and 2022 across offense categories, according to data published by the California Department of Justice. Exhibit i.16 below shows clearance rates across violent crimes and all property crimes from 2018 to 2023.

Exhibit i.16: San Francisco Clearance Rates (Percentages), 2018-2022

Offense	2018	2019	2020	2021	2022	2023
Homicide	95.7	65	75	75	61.8	94.1
Forcible Rape	16.1	14.2	18.7	12.2	14	9.9
Robbery	27.5	27.2	25.2	21.5	20	20.2
Aggravated Assault	43.1	43.4	36.9	36.7	35.6	37.2
Burglary	15.5	17.2	11.5	10.2	10	11.1
Motor Vehicle Theft	9.4	9.2	8.7	7.2	6.4	6.6
Larceny-Theft	5.1	4.7	3.8	2.4	2.9	3.6
Arson	22.2	24.7	20.4	22.8	25.9	24.1

Source: *Crimes and Clearances.* Open Justice website, California Department of Justice. Clearance rate data shown for San Francisco.

Acknowledgements

We would like to thank the employees and leadership of the San Francisco Police Department for their assistance and cooperation during this audit.

1. Violations of Overtime Limits and Excessive Use of Overtime

The San Francisco Police Department (SFPD) does not adequately control staff use of overtime or monitor and enforce established overtime limits. Our analysis of SFPD overtime data and applicable overtime limits, such as the maximum number of overtime hours an officer may work in a pay period or in a year, found that SFPD sworn staff regularly exceeded established overtime limits each year between FY 2018-19 to FY 2022-23. The analysis also showed that a small number of SFPD staff worked a comparatively large proportion of the Department's overtime: for example, in FY 2022-23, 209 individuals, or 12 percent of sworn staff who worked overtime, accounted for 32 percent of SFPD's total overtime hours. We also identified high users of overtime who consistently work the equivalent of 80-hour work weeks every week of the year, in some cases for multiple years in a row.

Overall, we found a lack of both internal and external accountability for overtime limit violations and excessive overtime at SFPD. The Department has not taken sufficient steps to enforce its overtime limits, and violations typically do not result in consequences or corrective action. In addition, several key Citywide overtime controls, such as annual public reporting and public hearings on overtime limit violations, did not occur between FY 2018-19 and FY 2022-23. Excessive overtime hours pose risks to public safety and officer health, may contribute to employee burnout and negatively affect morale, and may generate unnecessary financial costs for the City. SFPD must improve its oversight, reporting, and compliance with overtime policies to mitigate the risks associated with excessive overtime, including increased liability, impaired officer decision-making, and other negative health and public safety impacts.

Overview of Police Department Overtime Limits

San Francisco Police Department (SFPD) Department Notices and Bulletins,[1] San Francisco Administrative Code section 18.13-1, and a side letter agreement between the City and the Police Officers' Association establish overtime limits for SFPD members in the form of daily, weekly, pay period, and yearly maximum caps. Our review of these governing documents identified nine specific overtime limits that were in force for part or all of our audit scope period (FY 2018-19 to FY 2022-23). Exhibit 1.1 below summarizes the details of each overtime limit we identified.

[1] SFPD Department Bulletins and Department Notices are official communications issued by the Chief of Police. A Department Bulletin is a formal department-wide communication that typically contains directions, special orders, or general information relevant to all SFPD officers and staff, such as policy updates, procedural changes, or training announcements. Department Notices usually convey less formal or urgent information, such as reminders, updates on ongoing situations, or notifications about upcoming events that are relevant to SFPD personnel.

Exhibit 1.1: SFPD Overtime Limits in Force between FY 2018-19 and FY 2022-23

Originating Authority	Limit	Overview
SFPD Department Notices and Department Bulletins	1,040 overtime hours in one year	Department Bulletin A 19-162, issued in July 2019, states a limit of 1,040 overtime hours in one year. This limit was reduced to 520 hours of overtime in one year in Department Notice 21-045 in March 2021, consistent with Administrative Code section 18.13-1 (discussed below), although SFPD continued to internally report the original 1,040-hour limit in FY 2021-22.
	40 overtime hours in one pay period*	Department Bulletin A 17-112, issued in May 2017, states a limit of 40 overtime hours per pay period* and 20 overtime hours per work week. These limits were reaffirmed in Department Bulletin A 19-162 (July 2019) Department Notice 21-020 (February 2021), and Department Notice 21-045 (March 2021). The limits were in force throughout the audit scope period.**
	20 overtime hours in one week	
	14 working hours in a 24-hour period	Department Bulletin A 17-112, issued in May 2017, states a limit of 14 working hours within a 24-hour period. This limit was increased to 16 working hours in February 2021 (see below).
	16 working hours in a 24-hour period	Department Notice 21-020, issued in February 2021, increased the working hours limit from 14 to 16 hours within a 24-hour period. This limit remained active for the remainder of the audit scope period.
San Francisco Administrative Code section 18.13-1	520 overtime hours in one year	Administrative Code section 18.13-1 prohibits full-time City employees from working more than 520 hours of overtime in a year or 72 hours in a regular work week. This limit only applies to hours that incur a cost for the City, excluding overtime for which the City otherwise incurs no direct or indirect cost (such as 10B overtime, for which the City is reimbursed). SFPD may seek exemptions from the Administrative Code overtime limits in cases of critical staffing shortages by requesting a waiver from the Department of Human Resources. COVID-19 related waivers to this rule and SFPD's approved exemptions during the audit period are discussed later in this report section.
	72 working hours in one week	
Side Letter Agreement with the San Francisco Police Officers' Association	60 overtime hours in one pay period*	In December 2022, the City and the San Francisco Police Officers' Association entered into a side letter agreement titled "Mandatory Overtime Protocols," which was intended to be in effect for one year until December 2023. (The side letter agreement was prematurely terminated by SFPD in November 2023.) The agreement states that SFPD shall prohibit staff from working (a) more than 60 hours of overtime per pay period* and (b) more than fourteen consecutive calendar days without a day off.**
	14 working calendar days in a row	

Source: SFPD internal policy (Department Bulletins A 17-112 and A 19-162; Department Notices 21-020 and 21-045); San Francisco Administrative Code section 18.13-1; "Mandatory Overtime Protocols" side letter agreement between the City and the San Francsico Police Officers' Association.

*City pay periods are two weeks long.

**We note that the limit of 40 hours of overtime per pay period, established in Department Bulletin A 17-112 (May 2017) and reaffirmed in Department Bulletin A 19-162 (July 2019), Department Notice 21-020 (February 2021), and Department Notice 21-045 (March 2021), is inconsistent with the limit of 60 hours of overtime per pay period stated in the "Mandatory Overtime Protocols" side letter agreement with the San Francisco Police Officers' Association (December 2022).

SFPD Consistently Exceeds Overtime Limits

We conducted a comprehensive analysis of SFPD overtime HRMS[2] data and internal SFPD overtime reporting between FY 2018-19 to FY 2022-23 to evaluate whether SFPD adhered to the overtime limits summarized in Exhibit 1.1 above. Our analysis found that SFPD consistently violated all nine overtime limits over this five-year period.

Exhibit 1.2 below summarizes the number of overtime limit violations we identified between FY 2018-19 and FY 2022-23. To show changes over the five-year period, Exhibit 1.2 reports the total number of times an overtime limit was exceeded each year, regardless of whether the limit was in effect at the time. As we note in Exhibit 1.1 above, not all the policies limiting overtime were in effect for the full scope of our audit period, due to changes in internal SFPD policy, waivers from the Administrative Code annual overtime limit granted by the Department of Human Resources (DHR), and changes to the City's contract with the Police Officers Association late 2022. However, we consider these limits to be helpful common-sense benchmarks and indicators of excessive overtime, even if the limit was only in force for part of our audit scope period.

Key statistics reported in Exhibit 1.2 below include:

- **209 SFPD employees** worked **more than 1,040 hours of overtime** in FY 2022-23, which is equivalent to working 20 hours of overtime (or a 60-hour work week) each week for every week of the year.
- SFPD employees worked **more than 60 hours of overtime in a two-week pay period 2,420 times** in FY 2022-23, compared to only 41 times in FY 2018-19, an increase of 5,802 percent.
- In FY 2022-23, SFPD employees worked **14 or more days in a row without a day off 488 times**.

[2] Human Resources Management System (HRMS) is a digital platform SFPD uses to track various human resources functions within the Department, including payroll, attendance, and leave use.

Exhibit 1.2: Instances of Excessive Overtime, FY 2018-19 to FY 2022-23

Originating Authority	Limit	Effective Dates within Audit Scope (FY 2018-19 to FY 2022-23)		Instances of Excessive Overtime					
		Start	End	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	*% Change*
SFPD Department Notices and Department Bulletins	1,040 overtime hours in one year	07/30/2019	03/12/2021	7	14	11	98	209	*2,886%*
	40 overtime hours in one pay period	Throughout		1,459	1,818	890	4,436	7,391	*407%*
	20 overtime hours in one week			6,195	6,524	4,482	11,336	16,688	*169%*
	14 working hours in a 24-hour period	07/01/2018	02/05/2021	8,962	9,409	8,076	22,163	36,338	*305%*
	16 working hours in a 24-hour period	02/05/2021	06/30/2023	2,855	2,802	1,863	3,647	6,057	*112%*
San Francisco Administrative Code section 18.13-1, and DHR waivers	520 overtime hours in one year	07/01/2018	06/30/2021*	91	91	45	348	635	*598%*
	1,000 overtime hours in one year	07/01/2021	06/30/2022	0	0	0	23	155	
	1,500 overtime hours in one year	07/01/2022	06/30/2023	0	0	0	0	33	
	72 working hours in one week	Throughout*		763	1,451	764	3,100	8,240	*980%*
Side Letter Agreement with the San Francisco Police Officers' Association	60 overtime hours in one pay period	12/05/2022	06/30/2023**	41	138	31	724	2,420	*5,802%*
	14 working calendar days in a row			192	195	89	267	488	*154%*

Sources: Overtime limits: SFPD internal policy (Department Bulletins A 17-112, A 19-162, and 21-020; Department Notice 21-045); San Francisco Administrative Code section 18.13-1; "Mandatory Overtime Protocols" side letter agreement between the City and the San Francsico Police Officers' Association. Instances of excessive overtime: BLA analysis of SFPD HRMS data.

*In FY 2020-21, DHR informed City departments that it would not enforce the overtime limits established in Administrative Code section 18.13-1 due to COVID-19 constraints.

**As discussed in other sections of this report, the side letter agreement was intended to be in effect for one year from December 5, 2022 to December 5, 2023, but SFPD prematurely terminated the agreement effective November 1, 2023. For the purposes of our audit, we evaluated this limit during our audit scope period (ending June 30, 2023).

Violations of Internal Policy Overtime Limits

As shown in Exhibit 1.2 above, the results of our analysis show that SFPD failed to enforce its internal overtime limits and allowed widespread violations and excessive use of overtime between FY 2018-19 and FY 2022-23. Violations of every overtime limit in effect occurred in every year of our review. Our analysis also found that the frequency of overtime limit violations and excessive use of overtime increased significantly during this time period.

- In FY 2022-23, **SFPD staff worked more than 1,040 hours of overtime in one year 209 times**, which represents an increase of 2,886 percent compared to FY 2018-19. Working 1,040 hours of overtime in a year is equivalent to working 20 hours of overtime, or a 60-hour work week, each week for every week of the year.
- In FY 2022-23, **SFPD staff worked more than 40 hours of overtime in one two-week pay period 7,391 times**, which represents an increase of 407 percent compared to FY 2018-19. Working 40 hours of overtime in a pay period is equivalent to working 20 hours of overtime in a week, or a 60-hour work week, for two weeks in a row.
- In FY 2022-23, **SFPD staff worked more than 20 hours of overtime in a week 16,688 times**, which represents an increase of 169 percent compared to FY 2018-19.
- In FY 2022-23**, SFPD staff worked more than 16 hours in a 24-hour period 6,057 times**, which represents an increase of 112 percent compared to FY 2018-19. Working more than 16 hours in a 24-hour period, or a 16-hour day, most commonly means that an officer worked six hours of overtime before or after a 10-hour shift.

Violations of Administrative Code and DHR Overtime Limits

As shown in Exhibit 1.2 above, our analysis also found that SFPD regularly exceeded the Citywide overtime limits established in San Francisco Administrative Code section 18.13-1, which states that employees may not: (a) work overtime that exceeds 25 percent of their regularly-scheduled time (e.g., more than 520 hours of overtime for a full-time employee who works 2,080 hours annually), or (b) work more than 72 hours in a regular work week. These provisions of the Administrative Code apply only to overtime that incurs additional costs for the City, and therefore exclude 10B overtime, for which the City is reimbursed by private entities.[3]

The Administrative Code allows departments to request exemptions from these provisions under conditions of critical staffing shortages. According to records we obtained from the Department

[3] Citywide reporting and analyses of Administrative Code limits have not consistently included overtime that is worked for compensatory time off and overtime that is paid at straight time, although both incur direct or indirect costs for the City (the Administrative Code explicitly states that overtime worked for compensatory time off is considered an indirect cost). Throughout this report, our analysis of Administrative Code limits includes *all* non-10B overtime worked for either pay or compensatory time off.

of Human Resources (DHR), SFPD requested exemptions in three of the five years of our audit scope (FY 2019-20, FY 2021-22, and FY 2022-23). In addition, in FY 2020-21, DHR informed City departments that it would not enforce the overtime limits established in the Administrative Code due to COVID-19 constraints. As shown above, we found that even when DHR granted SFPD's exemption requests and increased annual overtime limits, SFPD violated these *revised* annual overtime limits.

Violations of Side Letter Agreement Overtime Limits

Our analysis also found that SFPD did not comply with its responsibilities to limit overtime as outlined in the "Mandatory Overtime Protocols" side letter agreement between the City and the San Francisco Police Officers' Association. The City and the Police Officers' Association entered into the side letter agreement in December 2022. It was intended to be in effect for one year until December 2023 but was prematurely terminated by SFPD in November 2023. The agreement states that SFPD shall not allow staff to work (a) more than 60 hours of overtime per pay period, or (b) more than 14 consecutive calendar days without a day off.

Exhibit 1.2 above reports data for these two overtime limits over the five-year period between FY 2018-19 and FY 2022-23 in order to show changes over time and quantify overall excessive use of overtime. We also reviewed overtime use only during the period that the side letter agreement was in effect to identify how frequently SFPD violated the terms of this agreement. (Prior to December 2022, exceeding these limits would not have been a violation of the side letter agreement, but we do consider those cases to be excessive uses of overtime.) Exhibit 1.3 below displays only the occurrences that violated the terms of the side letter agreement and occurred during our audit scope (December 2022 through June 2023).

Exhibit 1.3: Side Letter Overtime Violations, December 2022 through June 2023

Side Letter Overtime Limit	Number of Side Letter Violations
60 hours of overtime in a pay period*	1,412
14 working calendar days in a row**	280

Source: BLA analysis of SFPD HRMS data.

*Analysis period begins with the first full pay period following the signing of the side letter on December 5, 2022. This pay period started on December 10, 2022.

**Analysis period begins December 6, 2022, the day after the side letter was signed.

As shown in Exhibit 1.3 above, between December 2022 and June 2023, SFPD staff worked **more than 60 hours of overtime in a pay period 1,412 times** and worked **more than 14 consecutive days in a row without a day off 280 times**. All of these occurrences represent violations of the side letter between the City and the Police Officers' Association.

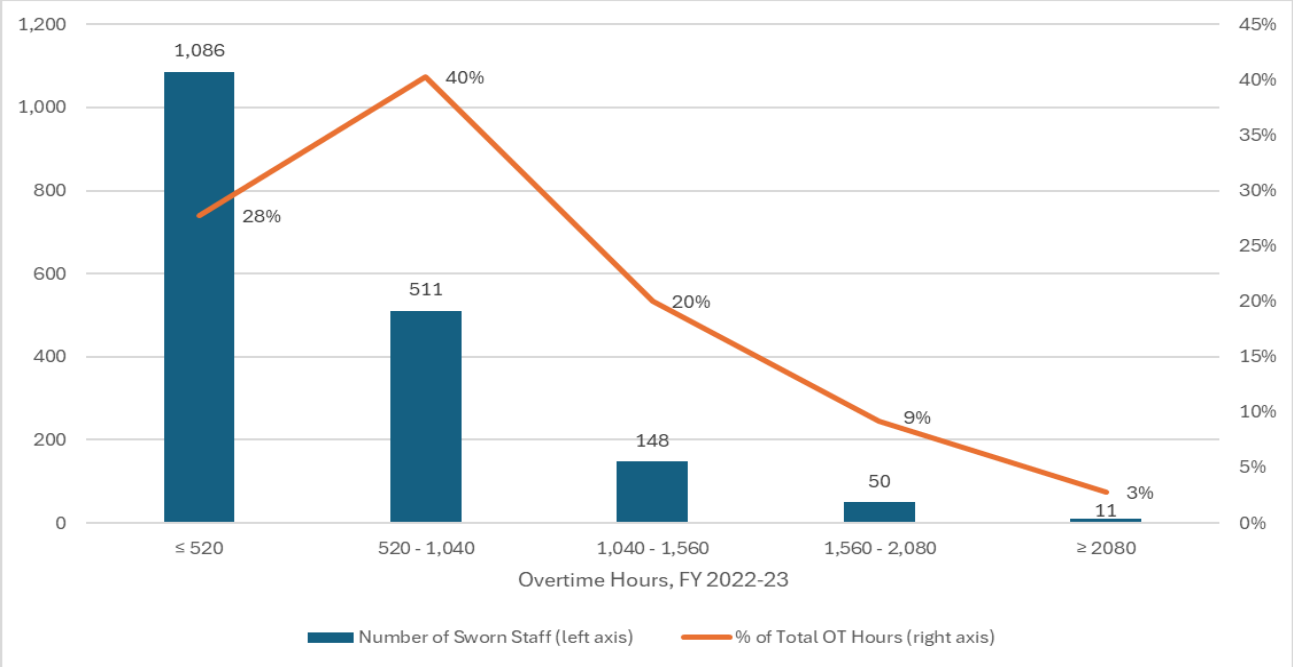
High Users and Uneven Overtime Distribution

We also used SFPD payroll data to analyze the distribution of overtime among sworn staff, evaluate the overall equity of overtime use, and identify high users of overtime. Our analysis found overall that the distribution of overtime hours is uneven at SFPD, and that a small number of individuals work a significant portion of the Department's overtime.

Overtime Distribution

In FY 2022-23, SFPD HRMS payroll data shows that 1,987 individuals in sworn job classifications were eligible to earn overtime (officers, sergeants, lieutenants, and inspectors).[4] Of those eligible, 1,806 worked overtime during the fiscal year, collectively logging 937,388 overtime hours.[5] Exhibit 1.4 shows the distribution of overtime hours worked by the 1,806 eligible staff who actually worked overtime in FY 2022-23.

Exhibit 1.4: Distribution of Overtime Hours Among 1,806 Sworn Staff, FY 2022-23



Source: BLA analysis of SFPD HRMS data.

Note: This analysis excludes the 181 eligible individuals who did not work any overtime in FY 2022-23, and includes 10B overtime.

---

[4] The SFPD overtime data we used for this analysis does not indicate whether an employee is full-duty or not. As a result, the 1,987 total may include officers, sergeants, lieutenants, and inspectors who are on extended leave, temporary modified duty, or who are otherwise less than full-duty employees, and who may not work overtime due to their leave or modified duty circumstances. The 1,987 total represents headcount, not full-time equivalent (FTE) staff, which accounts for the difference between these totals and the Introduction to this report.

[5] This total includes overtime worked in all funds, not just the General Fund, and differs from the overtime reported in the Introduction to this report for this reason.

The analysis shown in Exhibit 1.4 reflects the distribution of overtime hours worked among 1,806 sworn staff during FY 2022-2023. The data is categorized into five bins based on the number of overtime hours worked.

The majority of the overtime was worked by staff in the first two overtime bins (less than or equal to 1040 hours): as shown in Exhibit 1.4, 1,597 staff, or 88 percent, worked 68 percent of the total overtime hours. A smaller portion of staff worked more than 1,040 hours of overtime: 209 staff (12 percent) worked 32 percent of the total overtime hours. This distribution shows that while most of the eligible staff worked moderate levels of overtime, a few individuals worked an extensive amount of overtime, which indicates that overtime could be better distributed to better comply with the City's overtime regulations.

If the 937,388 overtime hours worked in FY 2022-23 had been evenly distributed among the 1,806 sworn staff who worked overtime during the fiscal year, each individual would have worked approximately 518 hours, and no individual would have surpassed the City's Administrative Code overtime limit of 520 hours.[6]

High Users of Overtime

Exhibit 1.5 below reports the overtime hours worked by the 15 sworn staff with the highest overtime in FY 2022-23, as well as how many times each staff member was among the Department's top 15 highest users of overtime from FY 2018-19 through FY 2022-23.

[6] The 520-hour limit does not include 10B overtime. However, the data presented in Exhibit 1.4 includes 10B hours. If the analysis had excluded 10B overtime, the average number of overtime hours per sworn staff who worked overtime would have been even lower, approximately 453 hours per sworn staff.

Exhibit 1.5: Summary of Overtime Hours for High Users of Overtime in FY 2022-23

Rank	Home Department	Total Overtime, FY 2022-23	% 10B	% Extended Work Week	% Other*	Number of Times in Top 15, FY 2018-19 to FY 2022-23
Officer	Southern	2,820	44%	56%	<1%	4
Officer	Southern	2,642	44%	56%	<1%	3
Officer	Potrero	2,611	49%	50%	<1%	2
Sergeant	Southern	2,473	44%	55%	3%	4
Officer	Taraval	2,423	30%	65%	2%	1
Sergeant	MTA	2,375	21%	78%	1%	1
Officer	Central	2,285	1%	94%	4%	1
Officer	Taraval	2,219	7%	88%	4%	1
Officer	MTA	2,202	59%	41%	2%	3
Officer	Airport FOB	2,130	27%	73%	6%	1
Officer	Airport FOB	2,123	20%	79%	<1%	1
Officer	Tactical	2,052	24%	73%	<1%	3
Officer	Taraval	2,018	44%	52%	3%	3
Officer	Potrero	1,959	23%	67%	7%	3
Officer	Taraval	1,951	<1%	76%	22%	1

Source: BLA analysis of SFPD HRMS data.

*Other includes overtime hours related to arrests, investigations, training, and miscellaneous overtime.

As shown in Exhibit 1.5 above, the 15 staff members with the highest overtime hours in FY 2022-23 all worked **nearly or more than double** a full-time workload of 2,080 hours per year (40 hours a week for 52 weeks of the year). In other words, each of these staff members worked nearly **two** full-time equivalent positions, or 80-hour workweeks, every week of the year.

In addition, our analysis shows that for 13 of the 15 highest users, voluntary 10B overtime generally accounts for at least 20 percent of overtime use. Extended work week overtime, which includes overtime for backfill or to staff special events, accounts for on average 67 percent of overtime use. Although some of the overtime hours in Exhibit 1.5 may have been mandatory to meet staffing needs, voluntary and discretionary 10B overtime was the second-largest category of overtime among SFPD's highest users. 10B overtime is paid for by private organizations, not the City, and for that reason the focus of the work is for the benefit of private entities, rather than the public at large.

Exhibit 1.5 above also shows that several staff members ranked in the top 15 multiple years between FY 2018-19 in recurring patterns of high overtime use. For example, the officer with the highest overtime hours has been in the top 15 four times since FY 2018-19. This pattern suggests that the Department is not monitoring high users of overtime, as discussed in an upcoming section of this report.

Fairness and Safety

Based on interviews with SFPD supervisors and command staff, the uneven distribution of overtime amount is due, in part, to the voluntary nature of many overtime assignments. As discussed in more detail in *Section 3: Management of Backfill Overtime* of this report, in FY 2020-21 and FY 2021-22 SFPD rotated mandatory overtime assignments for backfill to meet minimum staffing for patrol operations and special initiatives. Under this system, when the Field Operations Bureau district stations or the special event team required backfill for patrol shifts or event-related overtime, the Staffing and Deployment Unit was responsible for assigning overtime to available officers or sergeants in a centralized rotation process based on seniority.

As of September 2023, the management of backfill overtime transitioned from this centralized system to a more decentralized approach within Field Operations Bureau. At that time, the Department decentralized overtime management by providing captains an overtime budget to allocate at their discretion to staff under their supervision.

Despite the SFPD's efforts to improve the allocation of mandatory overtime, the Department's existing overtime reporting is not sufficient for management to control violations of overtime limits in the Administrative Code and the Department's own policies, as discussed below. To ensure a more even distribution of overtime and help ensure staff remain established overtime limits, Field Operations Bureau should develop a system that requires captains to pre-schedule backfill overtime for officers, sergeants, and lieutenants to the largest extent possible. Consistent pre-scheduling could provide some predictability in unavoidable overtime and allow staff to plan around the work obligations.

We acknowledge that for some sworn staff overtime is a benefit, and for other sworn staff it is a burden: some employees want to work high volumes of overtime to earn extra compensation, and other employees do not want to work overtime for a variety of reasons. Requiring SFPD to more evenly distribute overtime would take away this benefit from some individuals, especially the high users who regularly work high volumes of voluntary overtime, and burden other individuals with overtime that they do not want to work. However, as discussed in more detail later in this report section, extreme levels of overtime carry public health and safety concerns and can compromise officer decision-making.

SFPD Needs Better Reporting on and Accountability for Overtime

As part of our audit fieldwork, we also evaluated SFPD's and Citywide overtime monitoring and any consequences from working excessive overtime. Our review found that SFPD does not adequately monitor individual overtime use or report violations of established overtime limits. We also found that there is a lack of both internal and external accountability for overtime limit

violations and excessive use of overtime, and that violations of established limits typically do not have consequences or corrective action.

SFPD Internal Overtime Reporting

SFPD's primary overtime reporting and monitoring tool from FY 2018-19 to FY 2022-23 was biweekly overtime reports prepared by SFPD's Fiscal Division and distributed to SFPD leadership.[7] The biweekly overtime reports are created after the close of a pay period and contain summary data including: the use of overtime Department-wide during the pay period and year-to-date; the use of overtime by type and for specific divisions or initiatives; and some information on individual member use of overtime.

We reviewed SFPD's biweekly overtime reports for FY 2018-19 through FY 2022-23. While SFPD consistently produced biweekly reports for each of the pay periods from FY 2018-19 through December of 2022,[8] reporting generally did not occur beginning in January 2023: only five reports were produced for the 14 pay periods between January and June 2023. In addition, our review of the content of the reports found that SFPD did not consistently report or document individual overtime limit violations.

The biweekly reports in FY 2022-23 **sometimes reported**, but did not report consistently, violations of the following overtime limits:

- Limits established in SFPD Department Notices and Bulletins:
  - Reports of individual violations of 40 overtime hours per pay period and 16 working hours within 24-hour period and individuals on track to exceed the 1,040 hours of overtime of were reported for July 2022 through September 2022 but missing from reports for October 2022 through June 2023.[9]
- Limits established in the Administrative Code section 18.13-1 and DHR's waiver:
  - Reports of individuals on track to exceed 1,500 overtime hours per year were only included in one biweekly report in December 2022.

[7] In FY 2022-23, SFPD began developing an overtime dashboard as an additional internal monitoring tool. However, conversations with command staff and station captains indicate that the dashboard was not officially rolled out or used as a monitoring tool between FY 2018-19 and FY 2022-23, and many individuals we spoke to were not aware of its existence.

[8] Except for two missing reports in FY 2018-19.

[9] As discussed earlier in this report section, the 40-hour and 16-hour limits were effective throughout the fiscal year. The 1,040-hour annual limit was reduced to 520 hours via DN 21-045 in March 2021, but SFPD continued to internally report it in biweekly overtime reports.

SFPD's biweekly overtime reports in FY 22-23 **never reported** the following limits:

- Limits established in SFPD Department Notices and Bulletins:
  - 20 overtime hours in a week
- Limits established in the Administrative Code:
  - 72 working hours within a week
- Limits established in the side letter agreement:
  - 60 overtime hours in a pay period
  - 14 working calendar days in a row

Exhibit 1.6 summarizes overtime limit violations and/or excessive overtime use at SFPD from January to June 2023 that were not reported due to gaps in the content and frequency of biweekly overtime reports.

Exhibit 1.6: SFPD Biweekly Overtime Reports: Missing Reports and Examples of Unreported Instances of Excessive Overtime by Individual Sworn Staff, January 2023 to June 2023

			Unreported Instances of Excessive Overtime Use*		
Pay Period	**Overtime report produced?**	**Excessive overtime by individual staff reported?**	**40 overtime hours in one pay period**	**14 working calendar days in a row**	**16 working hours in a 24-hour period**
1/6/2023	*No*	*No*	256	20	244
1/20/2023	*No*	*No*	247	30	213
2/3/2023	*No*	*No*	353	29	251
2/17/2023	*No*	*No*	287	20	204
3/3/2023	*No*	*No*	287	24	214
3/17/2023	*No*	*No*	319	16	208
3/31/2023	Yes	*No*	281	17	242
4/14/2023	Yes	*No*	276	15	214
4/28/2023	Yes	*No*	322	36	259
5/12/2023	Yes	*No*	307	13	241
5/26/2023	Yes	*No*	279	18	203
6/9/2023	*No*	*No*	310	13	208
6/23/2023	*No*	*No*	349	11	241
6/30/2023	*No*	*No*	49	-	126
Total Unreported*			3,922	262	3,068

Source: BLA analysis, SFPD biweekly overtime reports

* This table does not cover the entire five-year audit scope or all the limitations associated with overtime reporting. We selected this six-month period to emphasize the scale of unreported excessive overtime during the Department's most infrequent use of biweekly overtime reports.

As shown in Exhibit 1.6, out of the 14 expected biweekly reports for the latter half of FY 2022-23, nine reports, or approximately 65 percent, were missing. The reports that were produced did not include information on individual excessive use of overtime. Given that the biweekly overtime reports were SFPD's primary overtime monitoring tool during this time period, the absence of these reports indicates inadequate overtime oversight and monitoring during a time when overtime use and overtime limit violations were increasing Department-wide. (As detailed in Exhibit 1.2 earlier in this report, the most excessive overtime use occurred during FY 2022-23.)

Improving the Usefulness of the Biweekly Overtime Reports

As part of our audit fieldwork, we interviewed eight supervisory staff (seven captains and one lieutenant) across eight different stations. Six of the eight supervisory staff reported that SFPD's biweekly overtime reports were not helpful, not being received, and/or often contained errors, while two of the eight supervisory staff reported the internal reports were helpful and being utilized within their station. However, both supervisors who stated the reports were being used and are helpful also stated that their stations generate their own reports through HRMS to supplement the information received in the biweekly reports. Additionally, most of the interviewed staff reported that they find daily overtime reporting, rather than biweekly reporting, to be a more useful tool for tracking overtime, and some staff advocated for a real-time overtime tracking system to improve the overtime usage within their station.

Overall, we conclude that in order to better control overtime limit violations and reduce excessive overtime, SFPD needs to consistently and regularly produce the biweekly overtime reports with detailed information on individual and departmental overtime usage, high users of overtime, and violations of *all* established overtime limits. Additionally, SFPD should implement a Department-wide daily overtime monitoring system or dashboard to provide current information for supervisors and enable them to proactively manage overtime usage to reduce violations of established overtime limits. During in our audit fieldwork, SFPD was developing multiple dashboards (one managed by the Fiscal Division and one managed by Field Operations Bureau) to track and report overtime use, and the dashboard developed by Field Operations Bureau now reports information on staff who violate some overtime limits (60 hours in a pay period and 16 hours in a day). However, Field Operations Bureau's dashboard does not track or report overtime used by staff in other bureaus in the Department, such as Investigations or the Airport.

Absence of Internal Overtime Accountability

In addition to inadequate internal monitoring and reporting, we also identified a lack of internal accountability for established overtime limits and an absence of consequences or corrective actions executed when overtime limit violations occurred

SFPD's policies state that once an employee has reached the overtime limits for the week or pay period, the employee is not permitted to schedule any additional voluntary overtime for the remainder of that pay period. However, SFPD has not adequately enforced this policy, as evidenced by the high rate of instances of excessive overtime use we identified. As shown in Exhibit 1.6 earlier in this report, many of SFPD's highest overtime users, who work the equivalent of 80-hour weeks for every week of the year, do so for multiple years in a row. The reoccurring and persistent pattern of excessive overtime among certain staff members suggests a lack of effective enforcement and accountability of overtime limits at SFPD.

SFPD staff who violate these overtime limit policies are subject to an administrative investigation. However, these investigations have been extremely limited: following our request for information on administrative investigations of violations of overtime limits during the audit scope, SFPD provided evidence of one investigation related to excessive overtime, which occurred in FY 2022-23. To increase internal accountability, SFPD should conduct regular audits of overtime hours worked as recommended in *Section 5: Overtime Policies, Procedures, and Management Best Practices* of this report. We also recommend that SFPD enforce administrative consequences for supervisors who approve excessive overtime without proper justification and for staff who consistently violate overtime policies.

Absence of External Overtime Reporting and Accountability

External overtime reporting also needs to be improved in order to increase accountability for excessive overtime use at SFPD and other City departments. As stated in Administrative Code sections 18.13-1(f)-(h), the Controller's Office should submit six- and nine-month financial reports to the Board of Supervisors detailing budgeted vs. actual overtime and departments' compliance with the 25 percent overtime limit and 72-hour workweek cap. An annual report should also include exemptions and recommendations to reduce overtime. These reports should be a regular agenda item for the Budget and Finance Committee. Non-compliant departments require a separate hearing to present their compliance plans.

Although the City's six- and nine-month financial reports issued between FY 2018-19 and FY 2022-23 included budgeted to actual overtime information, they did not include departmental compliance with Administrative Code overtime limits. In addition, no Annual Overtime Reports or hearings on departmental compliance with these limits were produced or held during FY 2018-19 to FY 2022-23.[10] However, in FY 2024-25, the Controller's Office produced a memorandum to the Mayor and the Board of Supervisors containing first-quarter department overtime spending and projections. We recommend that the Board of Supervisors, during its annual review of the

[10] The most recent Annual Overtime Report issued by the Controller's Office was for FY 2017-18.

Mayor's proposed budget for the Police Department, request the Department report on its compliance with the overtime limits established in the Administrative Code, the number of staff who exceeded those limits, and strategies it will employ in the coming fiscal year to better control overtime.

Health and Safety Consequences of Excessive Overtime

Limits on overtime are important for maintaining fiscal control and minimizing health and public safety risks. Research indicates that excessive overtime among police officers has significant health and operational consequences. Chronic fatigue from long hours impairs physical and mental abilities, leading to slower decision-making and reduced alertness, especially during late-night shifts or high-pressure situations. This impairment can compromise public safety and overall job performance. Additionally, the stress of extended work hours without adequate sleep can lead to burnout and other mental health challenges. Limiting excessive overtime is necessary to ensure both officer well-being and the effective functioning of law enforcement agencies.

Legal Consequences of Violating Labor Agreements

As discussed earlier in this report, in addition to violating its internal policies and provisions of the Administrative Code, SFPD also failed to comply with its responsibilities to limit overtime as outlined in the "Mandatory Overtime Protocols" side letter agreement between the City and the San Francisco Police Officers' Association. If the City fails to adhere to its labor agreements, it may result in labor unrest, arbitration, litigation, or an enforcement action by Public Employment Relations Board.

Factors Contributing to Excessive Overtime

As discussed in the Introduction to this report, SFPD's sworn staffing levels decreased between FY 2018-19 and FY 2022-23 due to low academy recruitment and sworn staff separations. The decrease in sworn staffing has required SFPD to use overtime to meet minimum staffing levels for district station patrol and to work special initiatives and special events. The increased reliance on extended work week overtime has contributed to the increase in overtime limit violations and overall the excessive use of overtime at SFPD. However, as discussed in *Section 3: Management of Backfill Overtime*, the Department's management of backfill overtime could be improved, and district stations sometimes overstaffed with backfill. In addition, as shown in our analysis of the highest users of overtime, although extended work week overtime was the largest category of overtime used by most of these high users, *voluntary and discretionary* 10B overtime was the second-largest category and accounted for more than 20 percent of most high users' overtime.

Finally, as discussed above and in *Section 5: Overtime Policies, Procedures, and Management Best Practices* and *Section 2: Management of Sick and Injury-Related Leave* of this report, SFPD does not consistently enforce its overtime controls and sick leave policy, both of which also contribute to excessive overtime.

Conclusion

Overall, SFPD does not adequately control staff use of overtime or monitor and enforce established overtime limits. Our analysis of SFPD overtime use between FY 2018-19 and FY 2022-23 found that SFPD staff consistently violated all nine of the established overtime limits that we tested over this five-year period. In addition, we found that SFPD's monitoring and reporting on overtime use needs improvement, and that there is a lack of both internal and external accountability for individual overtime use at SFPD, which has allowed an ongoing, increasing pattern of excessive overtime use over our five-year scope period. This pattern carries significant risks for SFPD, the City, and the community.

The decrease in SFPD staffing levels has exacerbated the challenge of managing overtime. While SFPD policy and the Administrative Code both allow for exceptions to overtime limits in the case of emergencies or critical staffing shortages, the frequency and extent of excessive overtime carry significant risks for the City. Increased reliance on overtime imposes physical and psychological strains on officers and intensifies existing problems related to fatigue, performance degradation, and health risks linked to extended working hours. The cyclical nature of this issue perpetuates the problem, as higher rates of officer burnout could lead to increased turnover, exacerbating the Department's reliance on overtime and amplifying SFPD's systemic staffing challenge. SFPD must improve its oversight and management of overtime, and must curtail excessive overtime use, to reduce potential risks to the City.

Recommendations

The Chief of the San Francisco Police Department should:

1.1 Consistently produce and distribute biweekly overtime reports with detailed information on individual and departmental overtime usage, including violations of established limits.

1.2 Implement a Department-wide, daily overtime monitoring system or dashboard to provide current information for supervisors and enable them to proactively manage overtime usage to reduce violations of established overtime limits.

1.3 Implement recommendation 5.1 to require the Overtime Compliance Unit to conduct regular audits of overtime hours worked and review whether they are justified according to SFPD policy.

1.4 Enforce administrative consequences for supervisors who approve excessive overtime without proper justification and for staff who consistently violate overtime policies.

1.5 Develop a system that requires captains to pre-schedule backfill overtime for officers, sergeants, and lieutenants to the largest extent possible.

The San Francisco Board of Supervisors should:

1.6 During its annual review of the Mayor's proposed budget for the Police Department, request the Department report on its compliance with the overtime limits established in the Administrative Code, the number of staff who exceeded those limits, and strategies it will employ in the coming fiscal year to better control overtime.

Benefits and Costs

Implementation of the proposed recommendations would involve both costs and benefits. The costs include staff time to develop and maintain a Department-wide, daily overtime monitoring system or dashboard and a system that requires captains to pre-schedule backfill overtime. Additional staff time at SFPD and the Controller's Office will be required for the monitoring and enforcement activities to ensure SFPD employees comply with overtime limits. However, the benefits are substantial. Improved monitoring, reporting, and enforcement could prevent excessive overtime and associated negative health and public safety risks and could lead to better resource allocation, more equitable workload distribution, and potentially lower overtime expenditures. Increased transparency and accountability can improve public trust and ensure compliance with City policy and legal obligations.

2. Management of Sick and Injury-Related Leave

Sick leave and injury-related leave used by sworn staff at the San Francisco Police Department (SFPD) increased by 77 percent over the five years of our audit scope period, from 14.4 days annually per employee in FY 2018-19 to 25.5 days annually per employee in FY 2022-23. Our in-depth review of paid sick leave use in FY 2022-23 revealed potential abuse patterns, including frequent sick leave use on specific days of the week (often the first or last day of a work week), Saturdays and Sundays to avoid weekend duties, and coinciding with working voluntary 10B overtime.

Our evaluation of SFPD's sick leave management practices found that SFPD did not enforce existing absenteeism policies or adequately monitor attendance during the audit scope period, which allowed potentially improper uses of sick leave. Additionally, we found that SFPD has not adhered to key provisions of the Memorandum of Understanding (MOU) with the Police Officers' Association related to sick leave, such as conducting quarterly reviews of sick leave to determine eligibility for 10B overtime assignments. As a result, approximately 51,000 ineligible 10B overtime hours were worked by employees with high sick leave usage between 2020 and 2023. SFPD has also not convened the required Health and Safety Committee to address health and safety issues or update the Department's Injury and Illness Prevention Program.

Increases in sick leave use, potential sick leave abuse, and inadequate sick leave management are directly tied to SFPD's overtime use, because as officers take more leave, SFPD must rely more on backfill overtime to cover these absences. Better management of sick leave and control of potential sick leave abuse would reduce SFPD's need for backfill overtime. SFPD should improve oversight, management, and control of sick leave in order to reduce avoidable backfill overtime and ensure that all leave is used legitimately and properly.

Leave Related to Injury and Illness

San Francisco Police Department (SFPD) sworn employees are entitled to a range of leave options, as outlined in the City and County of San Francisco Civil Service Commission Rule 220 on Leaves of Absence. Rule 220 applies to all classes of the uniformed ranks of SFPD, and includes provisions related to the use of sick leave (both paid and unpaid), disability leave and workers' compensation leave, and leaves under the Family and Medical Leave Act (FMLA) and California Family Rights Act (CFRA), along with leaves for family care, pregnancy, military obligations, education, and others. In addition, within the audit period, SFPD staff were allotted extra hours of leave due to public health emergencies, including the COVID-19 pandemic and air quality emergencies. From September 2020 through January 2024, COVID-19 illness was eligible for

worker's compensation benefits under California Senate Bill 1159, "Worker's Compensation Presumption."

The following report section focuses on SFPD sworn employees' use of sick leave and injury-related leaves to evaluate trends in sick leave use and workplace absenteeism, to identify potential abuses of these leaves, and to identify opportunities to improve management of sick leave at SFPD.

For the purposes of this analysis, we included the following categories of leave:

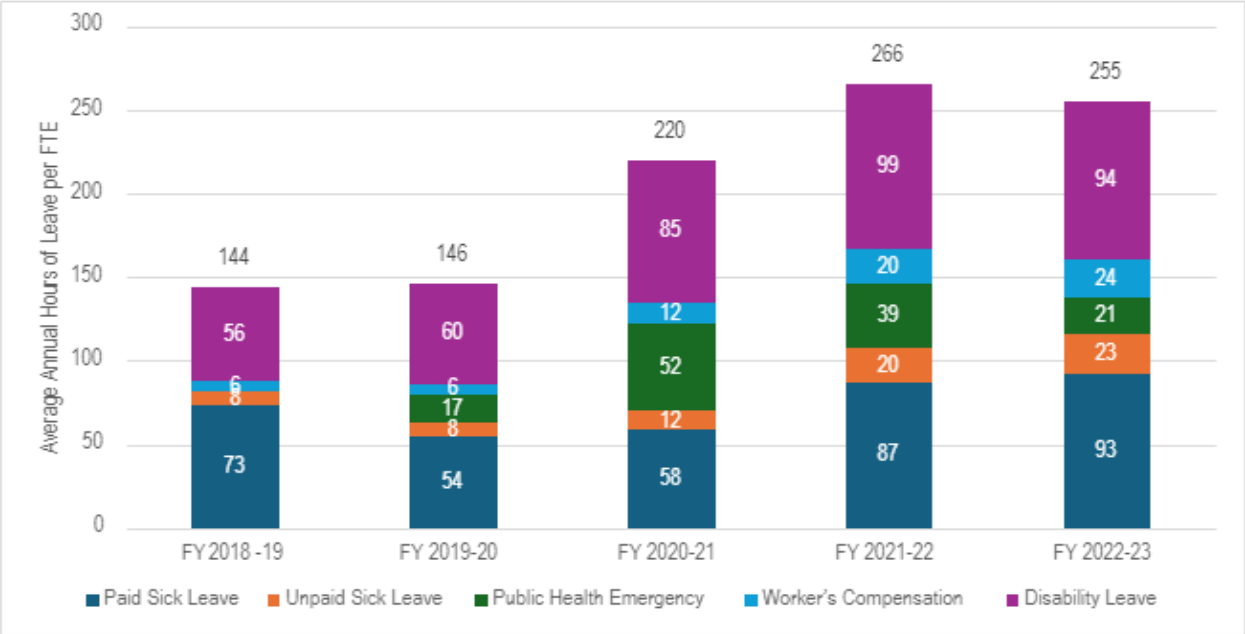
- Paid Sick Leave: Per SFPD Department General Order 11.01 and Civil Service Commission Rule 220, sick leave with pay is defined as a paid absence due to illness or injury not arising out of and during Department employment. Paid sick leave is accrued at the rate of four hours for each 80 hours of regularly scheduled paid service. SFPD staff can accumulate a maximum of 1,040 hours of paid sick leave.
- Unpaid Sick Leave: Per Civil Service Commission Rule 220, sick leave without pay may be granted to employees who are not eligible for sick leave with pay. Sick leave without pay may be approved for the period of the illness provided; however, this leave cannot extend beyond one year unless the additional leave would enable an employee to return to employment within a reasonable time.
- Disability Leave: California Labor Code section 4850 provides one year of full salary pay for public safety employees when they are injured on the job and placed on temporary disability. After this year of disability leave, employees move to regular workers' compensation benefits.
- Workers' Compensation: SFPD sworn staff are entitled to workers' compensation leave for work-related injuries or illnesses. Workers' compensation may also include full payment for necessary medical care related to the work injury and temporary disability benefits. The use of workers' compensation benefits was also permitted for COVID-19 illness from September 2020 through January 2024.
- Public Health Emergency: The Families First Coronavirus Response Act provided 80 hours of emergency paid sick leave for public sector workers from April to December 2020. California's COVID-19 Supplemental Paid Sick Leave and San Francisco's COVID-19 Paid Sick Leave Ordinance extended this leave through December 2022 and February 2023, respectively. Before the San Francisco ordinance expired, the City's Public Health Emergency Leave (PHEL) Ordinance, effective October 2022, provided up to 80 hours of paid leave for public health emergencies, including air quality events, although COVID-19 ceased to qualify after February 2023. However, PHEL remains available during other public health emergencies.

We did not include the following types of leave in our analysis: protected leaves covered under FMLA or CFRA, and time off associated with vacation, holidays, disciplinary suspension, military service, jury duty, bereavement, family care and parental leave, and other non-illness or injury-related leaves.

Increases in SFPD Use of Sick and Injury-Related Leave

SFPD sworn staff's use of sick and injury-related leave increased significantly from FY 2018-19 to FY 2022-23. Exhibit 2.1 shows the average annual hours of paid and unpaid sick leave, disability leave and worker's compensation, and public health emergency leave per filled sworn full-time equivalent (FTE) positions for each fiscal year within the audit scope. Total annual hours of sick and injury-related leave per sworn employee increased by 77 percent over this five-year period, from 144 hours per sworn employee in FY 2018-19 to 255 hours per sworn employee in FY 2022-23.

Exhibit 2.1: Average Annual Hours of Injury- and Illness-Related Leave Per Filled Sworn FTE, FY 2018-19 through FY 2022-23



Sources: Hours of leave: BLA analysis of SFPD payroll data. Actual filled FTEs: "Spending – FTE" database maintained by the Controller's Office published on DataSF. FTE staffing levels are calculated using the weekly payroll processed hours by the per-pay period standard hours. The data source is the payroll module within SF People and Pay, the City's payroll system.

As shown in Exhibit 2.1 above, between FY 2018-19 to FY 2022-23 paid sick leave use rose from 73 to 93 annual hours per sworn FTE. Unpaid sick leave also increased from eight to 23 annual hours per sworn FTE. Public health emergency hours, available beginning April 2020, fluctuated

with the highest usage in FY 2020-21 of 52 hours per FTE. Workers' compensation hours per FTE substantially increased from six hours in FY 2018-19 to 24 hours in FY 2022-23, and disability leave hours per FTE increased from 56 to 94 during this same time period.

Overall, total leave hours increased by 36 percent from approximately 363,353 hours used in FY 2018-19 to 497,669 hours used in FY 2022-23. Total annual hours of sick and injury-related leave per sworn employee increased from 144 hours, or the equivalent of 14.4 10-hour workdays, in FY 2018-19 to 255 hours, or the equivalent of 25.5 10-hour workdays, in FY 2022-23. These increases occurred despite a 23 percent decrease in sworn staffing over the same period.

Trends in the usage of sick leave are partially explained by additional allotment of leave hours for public health emergencies.[1] However, excluding Public Health Emergency Leave and assuming pre-COVID use of workers compensation, total sick leave (paid, unpaid, and disability) increased from 14.4 days per sworn FTE in FY 2018-19 to 21.6 days per FTE in FY 2022-23. In addition, as discussed in *Section 1: Violations of Overtime Limits and Excessive Use of Overtime*, working high amounts of overtime carries health and safety risks that may have contributed to an increase in sick leave usage during our audit scope period.

We compared trends in SFPD's use of sick leave to other public safety departments in San Francisco (the Sheriff's Office[2] and the Fire Department) and observed similar increases in sick leave use at those departments. However, we did not audit sick leave use at these departments or evaluate their sick leave management practices.

An increase in sick leave usage, especially in the context of a declining FTE count, has direct implications for SFPD's need for and use of overtime. As officers take more leave, the Department must rely more on backfill overtime to cover for these absences.

---

[1] Specifically, the additional hours allotted to sworn staff for emergencies may have supplemented traditional sick leave usage. Additionally, the increase in workers' compensation leave might be attributed to the enactment of California Senate Bill 1159, "Worker's Compensation Presumption," in September 2020. This bill, which expired in January 2024, classified an employee's COVID-19 illness as an occupational injury, making it eligible for workers' compensation benefits.

[2] We note that in FY 2023-24, the Sheriff's Office required a supplemental appropriation to transfer $3.8 million from its capital project funds, which were allocated to improve jail facilities, to pay for overspending its entire General Fund salary budget that year (as detailed in File No. 24-0609). Therefore, we do not have confidence that the other public safety departments are effectively managing their sick leave and we did not audit sick leave management at these departments.

Patterns in Use of Paid Sick Leave Indicate Potential Abuse

An in-depth review of all paid sick leave used by sworn SFPD staff in FY 2022-23 revealed patterns of potential abuse, including: frequent and consistent use of sick leave on a particular day of the week (usually the first or last day of an employee's work week), frequent and consistent use of sick leave on Saturdays and Sundays to avoid working on the weekend, and use of sick leave coinciding with voluntary 10B overtime[3] (when an employee works a voluntary 10B overtime shift and then calls out sick from their regularly scheduled watch or work day).

High Sick Leave Usage Occurred at the End of the Work Week

The current scheduling system for patrol officers, introduced in September 2020, organizes shifts so that Wednesday is an overlap day where a work week begins or ends. Exhibit 2.2 below shows average proportion of paid sick leave hours used by sworn staff at district stations by day of the week. On average, the staff included within the analysis used 31 percent of their paid sick leave on Wednesdays, whereas paid sick leave use on other days of the week ranged between nine and 14 percent. This higher use of sick time on Wednesdays is notable because it is the beginning or end of most officers' work weeks.[4]

Exhibit 2.2: Use of Sick Leave by Day of the Week, FY 2022-23

Day of the Week	Average Proportion of Individual Staff Sick Leave
Sunday	13%
Monday	9%
Tuesday	9%
Wednesday	31%
Thursday	11%
Friday	12%
Saturday	14%

Source: BLA analysis of SFPD payroll data.

*This analysis includes officers, sergeants, lieutenants, and investigators assigned to one of the ten district stations as their home department that used paid sick leave within the fiscal year, excluding those detailed to the Medical department (which typically indicates a long-term medical or administrative status due to a medical condition or injury).

[3] Administrative Code Section 10B allows the Chief of Police to provide police staffing for private events and for event organizers to pay the cost of such services.

[4] To provide more detail the data presented in Exhibit 2.2, the percentages reflect the proportion of individual staff paid sick leave hours, rather than merely representing the total hours of paid sick leave across the Department. The high percentage of sick leave on Wednesdays is not solely due to the number of officers scheduled that day, but rather indicates that Wednesday is the day on which individual officers most frequently take paid sick leave.

The clear spike in sick leave use on Wednesdays could point to potential misuse or abuse of sick leave, with some officers possibly extending their off-duty time by calling in sick on the first or last day of their shift. This pattern could also be due to long hours throughout the work week, leading to a higher likelihood of officers calling in sick as they approach the end of their work week. In addition, because officers know that Wednesday is an overlap day, they may deliberately schedule medical appointments and use sick leave on Wednesdays to minimize operational impacts of taking leave.

The implications of this trend are significant for SFPD's workforce management and operational efficiency. High rates of sick leave on Wednesdays could lead to understaffing of core law enforcement assignments, increased overtime costs for covering these shifts, and potential impacts on service quality or officer safety. It may also indicate broader issues with work-life balance, job satisfaction, or overall employee wellness among sworn staff.

Other Identified Potential Sick Leave Abuse Patterns

We also conducted a manual review of sick leave use in FY 2022-23 to check for other patterns that could indicate sick leave abuse. The results of our review are presented in Exhibit 2.3 below. We note that while the patterns of sick leave use described in the table below, such as taking the same day off every week or working voluntary 10B overtime[5] the same or following day, are consistent with potential abuse, it is possible that some uses of sick leave in the table below may have been justified and appropriate. In addition, Exhibit 2.3 below shows only the results of our audit sampling; there are likely additional incidences of sick leave use that could be indicative of abuse that were not included in our sampling.

[5] Administrative Code Section 10B allows the Chief of Police to provide police staffing for private events and for event organizers to pay the cost of such services.

Exhibit 2.3: Examples of Observed Potential Abuses of Paid Sick Leave, FY 2022-23

Potential Abuse Pattern	Observations in FY 2022-23
Regularly taking sick leave the same day(s) of the week throughout the year to extend time off or avoid working on the weekend	An officer called out sick Saturday and Sunday 19 times in the year, at least one time each month.
	A sergeant consistently called out sick on 38 of the 52 Wednesdays in FY 2022-23 (73 percent) and used sick leave every Wednesday in the seven-month period between 8/24/22 and 3/1/23.
	An officer called out sick 45 days in FY 2022-23. Of those 45 days, 36 days (80 percent) were either a Saturday or Sunday.
	Another officer consistently called out sick on 32 of the 52 Wednesdays in FY 2022-23 (62 percent). For 19 of these Wednesdays, the officer worked a voluntary 10B overtime shift the previous Tuesday (his day off), before calling out sick the following day.
	In the months of February and March 2023, a lieutenant who works a Monday-Friday schedule used sick leave to take a three- or four-day weekend every weekend for eight weekends in a row. In May and June of 2023, this same lieutenant called out sick one day of every single week for another eight weeks in a row.
	An officer consistently called out sick on 29 of the 52 Wednesdays in FY 2022-23 (56 percent).
	Another officer consistently called out sick on Wednesdays (15 times) and Sundays (12 times) to extend his days off. Of those times, he worked 10B overtime within one day of calling out sick ten times.
Taking sick leave while working voluntary 10B overtime on the same, previous, or following day	An officer took sick leave and worked a 10B overtime shift on the same, previous, or following day 25 times in FY 2022-23. In nine instances, the overtime and sick leave occurred on the same day: the officer worked voluntary 10B overtime starting at 7am and then called out sick for his 2:30pm watch.
	Another officer took sick leave and worked a 10B overtime shift on the same, previous, or following day 17 times in FY 2022-23. In one instance, the overtime and sick leave occurred on the same day.
Taking paid sick leave around holidays	An officer consistently called out on sick leave around legal holidays. For 6 of the 12 recognized legal holidays in FY 2022-23 (50 percent), the officer took either one or two sick leave days on the day(s) preceding or following the holiday. This same officer also called out sick on Saturday, Sunday, or both days 24 times in FY 2022-23, or on average nearly every other weekend, during FY 2022-23.
	A sergeant consistently called out on sick leave around legal holidays. For 7 of the 12 recognized legal holidays in FY 2022-23 (58 percent), the officer took either one or two sick leave days on the day(s) preceding or following the holiday.

Source: BLA analysis of SFPD payroll data.

SFPD has not Enforced Existing Leave Policies or Adequately Carried out Attendance Monitoring Activities

SFPD has established multiple policies and procedures to address and prevent sick leave abuse. However, given the increase in sick leave usage and observed potential sick leave abuse patterns described above, the effectiveness of these policies and SFPD's enforcement of their provisions appears limited. SFPD's internal policies on managing sick leave are as follows:

- Department Manual-16 (DM-16) Supervisory Investigations, effective May 2005, includes guidelines for sick leave abuse investigations. According to the "Sick Leave Abuse Investigations" section of DM-16, indications of sick leave abuse include frequent sick calls around weekends, using more sick time than earned, or using sick time for vacations. If abuse is suspected, supervisors should review the employee's work history and conduct a counseling session to establish a corrective performance plan. If the issue persists, further action involves interviewing the employee, documenting the findings, and potentially requiring a first-day sick slip,[6] and escalating the matter to the Management Control Division.
- Department Manual-06 Performance Improvement Program (PIP), effective June 1995, requires sergeants to make an entry within an officer's PIP binder every time an officer uses sick leave, indicating whether the sick day was used in conjunction with the officer's watch off or in conjunction with a weekend.
- Department Bulletin 24-050 "Sick Leave Abuse" was issued in March 2024, outside the scope of this audit. The bulletin calls attention to the provisions of Civil Service Commission Rule 220 governing sick leave, specifically as it relates to sick leave abuse. The bulletin also reinforces the existing policies outlined in the earlier policies mentioned above. The bulletin states that supervisors are to monitor employees' sick leave use for patterns of abuse. Supervisors must first counsel the employee and explore support options, including the San Francisco Employee Assistance Program and reasonable accommodations, before escalating to reviewing work history, interviewing the employee, and potentially requesting a Sick Leave Restriction[7] through SFPD's Internal Affairs Division if sick leave abuse persists. The bulletin also includes a non-exhaustive list of activity that could indicate a pattern of abuse: sick leave use on the first or last day of

[6] A first-day sick slip, as mentioned in the DM-16 Supervisory Investigations Manual refers to a requirement for an employee to provide documentation from a healthcare provider verifying their illness or inability to work on the very first day they call in sick.

[7] While on "Sick Leave Restriction," an employee may only use sick leave with a medical certification from a health care provider. Sick leave restriction must be approved by the Chief of Police.

an employee's work week, after denial of a vacation or day off request, repeatedly coinciding with special events, immediate use upon earning sick leave time, and/or reasons unrelated to those established in Civil Service Commission Rule 220.7 (e.g. to attend a social function, a sporting event, etc.).

In addition to SFPD's internal policies on sick leave management, Civil Service Commission Rule 220 addresses sick leave abuse primarily through its provisions regarding the management and verification of sick leave usage. To ensure proper use of sick leave, appointing officers may require proof of incapacitation for absences. If an employee fails to provide the necessary documentation, their pay may be withheld. Additionally, employees are prohibited from engaging in secondary employment while on sick leave unless they have obtained permission from their appointing officer, with violations potentially leading to disciplinary action.

The rule also empowers appointing officers to establish attendance standards and allows them to monitor patterns of sick leave usage that may indicate abuse, such as frequent absences on Mondays or Fridays or during holiday periods. If sick leave abuse is suspected, supervisors can require documentation to verify the legitimacy of the absence. Continued abuse of sick leave can result in disciplinary measures, including counseling, formal warnings, or even termination. Overall, Civil Service Commission Rule 220 provides a structured approach to managing sick leave while safeguarding the integrity of the system and ensuring that employees use their leave appropriately.

Inadequate Enforcement

While the policies described above provide a framework for identifying and addressing potential sick leave abuse, SFPD's implementation and enforcement of their provisions has not been sufficient to prevent the potential sick leave abuse we observed. SFPD's inability to curb the increasing trend of sick leave usage indicates systemic failures in policy enforcement and oversight. Our analysis identified several weaknesses emerge in SFPD's current approach to managing leave, specifically sick leave abuse, which are summarized below.

Enforcement Inconsistency

Despite clear guidelines related to sick leave abuse investigation and monitoring, the frequency and thoroughness of sick leave abuse investigations at SFPD needs improvement. Following our request for information on sick leave abuse investigations that occurred during our audit scope, the Department reported that, as of September 2024, one sick leave abuse investigation was underway but did not provide any information regarding past investigations. Separately, following our request for information on administrative abuse investigations related to excessive overtime, the Department reported that in FY 2022-23 an investigation was conducted into a complaint that an employee offered money to coworkers to call in sick so they could work the

resulting backfill overtime themselves. The case was closed due to a finding or proper conduct and insufficient evidence.

As part of our audit fieldwork, we interviewed eight supervisory staff at eight different SFPD district stations. Of the eight supervisory staff, three reported they were not monitoring sick leave abuse. Two supervisory staff reported that active monitoring of sick leave abuse is not currently being conducted, but that potential abuse may be addressed if it is brought to the supervisor's attention. Three supervisory staff mentioned that they monitor sick leave abuse to some extent through informal methods, such as during scheduling or through direct communication with lieutenants, and cited the smaller sizes of the stations, where such issues are more likely to come to their attention, as a reason for using these approaches. Only one supervisor mentioned the use of formal sick leave abuse investigations. One supervisor said they would benefit from a system that allows documentation of abuse, which indicated that this individual was unaware of SFPD's policy requiring supervisors to enter sick leave in an employee's Performance Improvement Plan binder. Another supervisory staff member noted that SFPD rigorously monitored sick leave approximately a decade ago, but that since then, it has not been a priority until very recently.

Supervisor Training Deficits

In 2019, the Department of Human Resources (DHR) conducted an analysis of sick leave utilization across City departments, which revealed that SFPD's sick leave usage was substantially exceeded the national average. In October 2019, DHR presented these findings to SFPD's command staff and suggested leave management training for SFPD management. Despite DHR's suggestions, SFPD did not request leave management training from DHR until four years later, during which time SFPD use of sick and injury-related leave continued to increase as summarized in Exhibit 2.1 earlier in this report.

In 2023, SFPD labor relations staff requested that DHR provide training to supervisory personnel on sick leave management. DHR conducted nine training sessions in early 2024. Out of 568 SFPD employees directed to participate in these training sessions, only about 40 percent, or 225 employees, attended.

Insufficient Leave Tracking and Reporting

During our audit scope, SFPD did not produce reports to track or analyze sick leave usage patterns.[8] DHR has the ability to generate medical leave reporting and analytics for City

[8] After reviewing our draft report, SFPD informed us that the Department implemented a sick leave usage dashboard in November 2023. According to SFPD, this dashboard is accessible to all command staff and is intended to monitor sick leave usage. While SFPD provided documentation confirming the dashboard's existence, the Department did not provide evidence of its active use by command staff.

departments: DHR's policy, "Medical Leaves Program's Reporting and Analytics," states that beginning January 2018, DHR will provide bi-annual attendance reports covering sick leave hours taken per staff member. The policy also states that City departments can request the report at any time during the year for any timeframe or classification. Despite this policy, DHR staff reported that the bi-annual attendance reporting has not been conducted since 2019 due to staffing shortages. DHR also reported that SFPD never requested an attendance report.

Overall Inadequate Policy Enforcement

In summary, while SFPD has established policies to manage sick leave and address abuse, enforcement of these policies has been inadequate and inconsistent, leading to potentially increased misuse of sick leave and an unnecessary need for backfill overtime. Despite established guidelines for investigating sick leave abuse and DHR's 2019 analysis showing that SFPD sick leave use significantly exceeded the national average, SFPD sick leave use has continued to increase since 2019, and training for supervisors on sick leave management only began in 2024. Additionally, as summarized above, SFPD lacked effective tracking systems to monitor sick leave patterns during the audit scope, and not all supervisory staff consistently and adequately monitor for sick leave abuse.

We recommend that SFPD enforce existing sick leave policies to ensure that supervisors consistently monitor sick and injury-related leave. Supervisors should monitor employee attendance records for patterns that could indicate abuse and take corrective action where necessary. We also recommend that SFPD develop a process for tracking and analyzing sick leave usage patterns that includes (a) real-time monitoring of leave and potential abuse, and (b) the generation of detailed reports that can be used to inform management decisions and ensure compliance with Departmental policies. To improve accountability, SFPD should conduct regular internal audits of sick leave usage and management practices to ensure that policies are being followed and that any instances of non-compliance are sufficiently addressed. These audits should also assess the effectiveness of the corrective actions taken by supervisors. Enforcement of sick leave policies should be incorporated in performance reviews for all sworn staff.

SFPD is Not Compliant with Certain Aspects of Labor Agreement Provisions Related to Illness and Injury

The Memorandum of Understanding (MOU) between the City and the Police Officers' Association applicable to our audit timeframe was in effect from July 1, 2018, through June 30, 2023.[9] Based

[9] The current Memorandum of Understanding between the City and the Police Officers' Association took effect July 1, 2023.

on a review of the MOU's requirements and interviews with SFPD staff, we found that SFPD did not comply with certain provisions of the MOU related to sick leave and illness and injury prevention. As discussed in *Section 1: Violations of Overtime Limits and Excessive Use of Overtime* of this report, violations of the MOU are legal and financial risks to the City.

SFPD Has Not Conducted Required Sick Leave Reviews to Determine 10B Overtime Eligibility

The MOU between the City and the Police Officers' Association states that effective January 1, 2021, SFPD employees are not eligible to work 10B overtime[10] assignments if they have used more than 20 hours of paid sick leave in the prior three months. The change to the labor agreement was included in the First Amendment to the 2018-2023 MOU and approved by the Board of Supervisors. Paid sick leave usage is required to be reviewed on a quarterly basis to determine eligibility for 10B overtime assignments. This provision, noting an effective date of January 2021, is also included in the current MOU, effective 2023-2026.

SFPD staff report that only one review of sick leave usage and 10B overtime eligibility was conducted in late 2021. The review found more than 400 employees ineligible to work 10B assignments due to their sick leave use. However, SFPD did not enforce this provision of the MOU and did not take action to prevent ineligible employees from working 10B overtime. As shown in Exhibit 2.4 below, our review found that in a given quarter, between 50 and 148 sworn staff should not have worked 10B overtime shifts based on their use of sick time in the prior quarter, which resulted in approximately 51,000 ineligible 10B overtime hours worked between January 2021 and June 2023.

[10] Administrative Code Section 10B allows the Chief of Police to provide police staffing for private events and for event organizers to pay the cost of such services.

Exhibit 2.4: SFPD Staff Ineligibility for 10B Overtime Assignments due to Sick Leave

Paid Sick Leave Review Period	Number of Sworn Staff Ineligible to Work 10B	10B Eligibility Period	Ineligible Sworn Staff that Worked 10B	Hours of Ineligible 10B Hours Worked
Sept. 2020 – Nov. 2020	352	Jan. 2021 – March 2021	72	4,964
Dec. 2020 – Feb. 2021	348	April 2021 – June 2021	50	2,304
March 2021 – May 2021	458	July 2021 – Sept. 2021	69	2,670
June 2021 – Aug. 2021	499	Oct. 2021 – Dec. 2021	80	3,902
Sept. 2021 – Nov. 2021	540	Jan. 2022 – March 2022	60	2,213
Dec. 2021 – Feb. 2022	593	April 2022 – June 2022	141	6,775
March 2022 – May 2022	539	July 2022 – Sept. 2022	111	5,712
June 2022 – Aug. 2022	566	Oct. 2022 – Dec. 2022	114	7,021
Sept. 2022 – Nov. 2022	587	Jan. 2023 – March 2023	103	7,090
Dec. 2022 – Feb. 2023	576	April 2023 – June 2023	148	8,557
Total	**5,058**		**948**	**51,206**

Source: BLA analysis of SFPD payroll data.

The use of sick leave and subsequent assignment of 10B shifts noted above is not in compliance with the terms of the MOU with the San Francisco Police Officers' Association. The inclusion of specific provisions in the MOU regarding the ineligibility for 10B assignments after using more than 20 hours of paid sick leave the previous quarter indicates that excessive sick leave and 10B overtime is an ongoing issue that warrants formal measures to address and mitigate the problem. If SFPD officers are calling out sick from their regular duty and then working 10B overtime assignments, there is a possibility not only that the officers might not be actually sick when they use sick leave, but also that officers may be prioritizing voluntary overtime for outside organizations over the operational needs of the Police Department. We recommend that SFPD adhere to the provisions of the Memorandum of Understanding with the Police Officers' Association by conducting quarterly reviews of sick leave usage to determine eligibility for 10B overtime assignments. Any employee exceeding the 20-hour threshold of sick leave in the prior three months should be deemed ineligible for 10B assignments.

As noted earlier in this report section, in our review of a sample of paid sick leave usage during FY 2022-23, we identified multiple instances where SFPD staff used sick leave that coincided with

voluntary 10B overtime assignments. For example, an officer at Central Station took sick leave and worked a 10B overtime shift on the same, previous, or following day 25 times in FY 2022-23. In nine instances, the overtime and sick leave occurred on the same day: the officer worked voluntary 10B overtime starting at 7am, and then called out sick for his 2:30pm watch. In another example, an officer at Southern Station took sick leave and worked a 10B overtime shift on the same, previous, or following day 17 times in FY 2022-23. In one instance, the overtime and sick leave occurred on the same day.

Our review of sick leave and voluntary 10B overtime assignments suggest potential misuse of sick leave. SFPD supervisory staff report that officers often find 10B assignments easier than regular duties, which may incentivize the misuse of sick leave to avoid working regular assignments in favor of 10B overtime shifts. When officers use sick leave in conjunction with 10B overtime, it not only circumvents the intent of sick leave as a benefit for legitimate illness or injury but also disrupts regular staffing schedules and places additional strain on the Department. It also leads to increased overtime use and costs to backfill vacant shifts, increased reliance on overtime to maintain minimum staffing levels, and potential morale issues among staff who adhere to the intended use of sick leave. Moreover, lack of enforcement of sick leave polices provides a tacit approval from executive management and implies that the policies do not matter, which impacts the overall effectiveness and trust in Department policies and the fair distribution of overtime opportunities.

SFPD Did Not Convene a Health and Safety Committee

SFPD did not adhere to the requirement in the MOU with the Police Officers' Association to convene a Health and Safety Committee bi-annually. SFPD staff report that as of April 2024, the Department has never held a Health and Safety Committee meeting.[11] The purpose of this committee is to address health and safety issues and review updates to SFPD's Injury and Illness Prevention Program. Title 8 of the California Code of Regulations, Section 3203, mandates that every California employer establish an Injury and Illness Prevention Program that includes identifying responsible individuals, ensuring employee compliance through training and incentives, and maintaining clear communication about workplace safety and health. Employers who elect to use a safety and health committee to comply with the communication requirements of Section 3203 should meet regularly, but not less than quarterly. Given that the SFPD Health

[11] After reviewing our draft report, SFPD reported to us that the first Health and Safety Committee meeting was held in May 2024.

and Safety Committee did not meet at any point during our audit scope period, the Department was not compliant with either the provisions of the MOU or California state regulations.

The best practices related to the Injury and Illness Prevention Program emphasize the importance of regular updates to ensure the program remains effective and compliant with regulatory requirements. However, SFPD has not updated their Injury and Illness Prevention Program since 2016.[12] According to the California Department of Industrial Relations, an effective IIPP should be reviewed and updated periodically—ideally on a quarterly, semiannual, or annual basis—depending on the specific needs and risks associated with the workplace. This regular review process is crucial for identifying and addressing new hazards, changes in operations, and any deficiencies revealed during inspections or audits.

SFPD does have a Behavioral Science Unit, which is a peer-driven employee assistance initiative focused on suicide prevention and mental health care for all Department staff and their families. The Behavioral Science Unit provides confidential support services, including counseling, peer and critical incident support, a catastrophic illness program, mental health referrals, and chaplaincy for crisis and grief support. Although SFPD's establishment of the Behavioral Science Unit reflects a commitment to individualized support for officers, particularly in mental health and crisis intervention, the work of the Unit does not fulfill the Department's obligation to convene a Health and Safety Committee, as required by the MOU.

The lack of regular Health and Safety Committee meetings and updates to the Injury and Illness Prevention Program may be related to broader issues with managing sick leave, disability leave, workers' compensation, and overtime at SFPD. Without a functioning Health and Safety Committee and an updated Injury and Illness Prevention Program, SFPD may be less equipped to address health-related absenteeism proactively, which could contribute to the misuse of sick leave and the increases in workers' compensation and disability leave we observed. Additionally, the absence of a regularly updated Injury and Illness Prevention Program means that the Department may not be fully aware of emerging health and safety risks, which could exacerbate the need for overtime to cover shifts for absent employees. SFPD should establish and regularly convene the Health and Safety Committee as required by the MOU with the Police Officers' Association. This committee should review and update the Injury and Illness Prevention Program at least annually, or more frequently as necessary, to address emerging health and safety risks within the Department.

[12] After reviewing our draft report, SFPD reported to us that as of October 2024, the IIPP had been updated and was pending approval from the Chief of Police.

Increased Absenteeism and Operational Challenges

Increases in sick leave and injury-related leave, potential sick leave abuse, and inadequate sick leave management have direct implications for SFPD's overtime use, because as officers take more leave, SFPD must rely more on backfill overtime to cover these absences. When officers are frequently absent, SFPD must reassign duties or require other officers to work overtime to cover absences, which not only strains SFPD's overtime budget but also exacerbates the Department's existing staffing shortage. Better management of sick leave and control of potential sick leave abuse would reduce SFPD's need for backfill overtime.

According to academic research,[13] the increased workload on remaining officers that results from absenteeism can lead to fatigue and decreased morale, which may further contribute to absenteeism and create a cycle of operational strain. Absenteeism generates additional costs for the City associated with overtime pay along with potential declines in service quality. Effective management of absenteeism at SFPD is necessary to mitigate these issues, and we recommend that SFPD implement a robust sick leave tracking and audit system and provide adequate training for supervisors on sick leave management.

Additionally, SFPD could encourage good attendance by incorporating sick leave use into employees' eligibility to earn "fitness award" time off, which is a type of discretionary earned time off that can be used like regular vacation time. As outlined in Department General Order 11.10, SFPD's Physical Fitness Evaluation Program evaluates officer health through a fitness assessment test (a 1.5-mile run, sit-ups, push-ups, body composition, and grip strength) and blood pressure measurement, and officers who achieve a certain score on the fitness assessment test are eligible to this earn extra time off. Currently, SFPD does not consider an employee's use of sick leave in this evaluation. However, incorporating past sick leave use into eligibility for "fitness award" time, similar to how sick leave use is considered when determining eligibility for 10B overtime assignments, could encourage good attendance by disincentivizing unnecessary sick leave use. We recommend that SFPD and the City negotiate with the Police Officers' Association to revise Department General Order 11.10 to make employees who used more than 40 hours of paid sick leave the previous six months ineligible to earn "fitness award" time off.[14]

---

[13] Riedy S, Dawson D, Fekedulegn D, Andrew M, Vila B, Violanti JM. Fatigue and short-term unplanned absences among police officers. Policing. 2020 Apr 30;43(3):483-494. doi: 10.1108/pijpsm-10-2019-0165. PMID: 34135688; PMCID: PMC8205509.

[14] As discussed earlier in this section, under the MOU between the City and the Police Officers' Association, SFPD employees should not be eligible to work 10B overtime assignments if they have used more than 20 hours of paid sick leave in the prior three months. Because "fitness award" time off is awarded every six months, we established the proposed sick leave use cap at 40 hours for a six-month period for "fitness award" time off.

SFPD could also encourage good attendance around the holidays by restricting eligibility to earn holiday compensation[15] when an employee calls out sick on the days surrounding a holiday. The MOU between the City and the San Francisco Fire Fighters Union (Local 798, IAFF, AFL-CIO) imposes such a restriction, beginning on page 32 of the MOU: "Employees who utilize sick pay on a shift commencing either within two calendar days before, on the day of, or within two days after a holiday […] shall not receive the holiday premium for two pay periods. For the Thanksgiving holidays, a single continuous usage of sick pay by an employee during any or all of the shifts commencing either within two calendar days before Thanksgiving Day, Thanksgiving Day, the Day After Thanksgiving, or the day after the Day After Thanksgiving, will result in that employee not receiving the holiday premium for the two subsequent pay period." We recommend that SFPD negotiate with the Police Officers' Association to include a similar restriction for SFPD sworn staff.

Conclusion

The rise in absenteeism of SFPD sworn staff between FY 2018-19 and FY 2022-23 has coincided with concerning patterns of potential sick leave abuse, particularly at the end of work weeks, around weekends, and in conjunction with 10B overtime assignments. Although SFPD has established policies to manage sick leave and address abuse, enforcement of these policies has been inadequate and inconsistent, leading to potentially increased misuse of sick leave and an unnecessary need for backfill overtime between FY 2018-19 and FY 2022-23. Despite warnings in 2019 from the Department of Human Resources and its established policies to control sick leave abuse and misuse, SFPD did not effectively enforce absenteeism rules or conduct the required reviews to ensure its compliance with the City's labor agreement with the Police Officers' Association. SFPD should strengthen its oversight of sick leave, improve leave management practices, and ensure that all sick and injury-related leave is used appropriately.

Recommendations

The Chief of the San Francisco Police Department should:

2.1 Enforce existing sick leave policies to ensure that supervisors consistently monitor illness- and injury-related leave usage. Supervisors should monitor employee attendance records for patterns that could indicate abuse and take corrective action where necessary.

[15] Officers who are required to work on holidays receive additional compensation or compensatory time off at the rate of time-and-one-half.

2.2 Adhere to the provisions of the Memorandum of Understanding with the Police Officers' Association by conducting quarterly reviews of sick leave usage to determine eligibility for 10B overtime assignments. Any employee exceeding the 20-hour threshold of sick leave in the prior three months should be deemed ineligible for 10B assignments.

2.3 Establish and regularly convene the Health and Safety Committee as required by the Memorandum of Understanding with the Police Officers' Association. This committee should review and update the Injury and Illness Prevention Program at least annually, or more frequently as necessary, to address emerging health and safety risks within the Department.

2.4 Develop a process for tracking and analyzing sick leave usage patterns that includes (a) real-time monitoring of leave and potential abuse, and (b) the generation of detailed reports that can be used to inform management decisions and ensure compliance with Departmental policies.

2.5 Conduct regular internal audits of sick leave usage and management practices to ensure that policies are being followed and that any instances of non-compliance are sufficiently addressed. These audits should also assess the effectiveness of the corrective actions taken by supervisors.

2.6 Incorporate compliance with sick leave policies into performance evaluations of all sworn staff.

2.7 Negotiate with the Police Officers' Association to revise Department General Order 11.10 to make employees who used more than 40 hours of paid sick leave the previous six months ineligible to earn "fitness award" time off.

2.8 Negotiate with the Police Officers' Association to include a restriction on sworn employees' eligibility to earn holiday compensation when an employee calls out sick on the days preceding or following a holiday in the Memorandum of Understanding between the City and the Police Officers' Association.

Benefits and Costs

Implementation of the proposed recommendations can be accomplished within the existing resources of the Department and would enhance SFPD's ability to manage sick leave effectively, reduce instances of abuse, and ensure that resources are allocated efficiently. By improving oversight and fostering a proactive approach to health and safety, SFPD can mitigate the operational disruptions caused by excessive absenteeism, which would lead to more predictable

staffing levels, decreased reliance on overtime, and overall cost savings. These recommendations would also improve employee accountability and internal and external trust in the SFPD's management practices.

3. Management of Backfill Overtime

There are opportunities to improve the San Francisco Police Department (SFPD)'s management of backfill overtime to ensure district stations have adequate patrol coverage for 911 response. Of the 197,211 backfill overtime hours recorded in FY 2022-23, 25,112 hours, or 13 percent, were worked for non-patrol activities such as foot beats, tactical deployments, and non-station field operations, and another nine percent did not have a radio code indicating the purpose of the overtime. Our analysis of backfill overtime hours and station minimum staffing levels found that SFPD's FY 2021-22 and FY 2022-23 backfill practices resulted in uneven coverage at district stations, with too much backfill overtime worked at some stations on some days and not enough worked at other stations on other days. We recommend that SFPD improve its tracking and monitoring of backfill overtime and audit the purpose and need for non-patrol backfill. Before future station watch sign-ups, Field Operations Bureau should identify stations that regularly exceeded or failed to meet minimum staffing levels during the previous six-month period and make reasonable attempts to adjust watch staffing levels as needed. We also recommend that SFPD annually prepare a detailed patrol staffing model to calculate the needed budget for backfill overtime to ensure the budget remains an effective internal control and management tool.

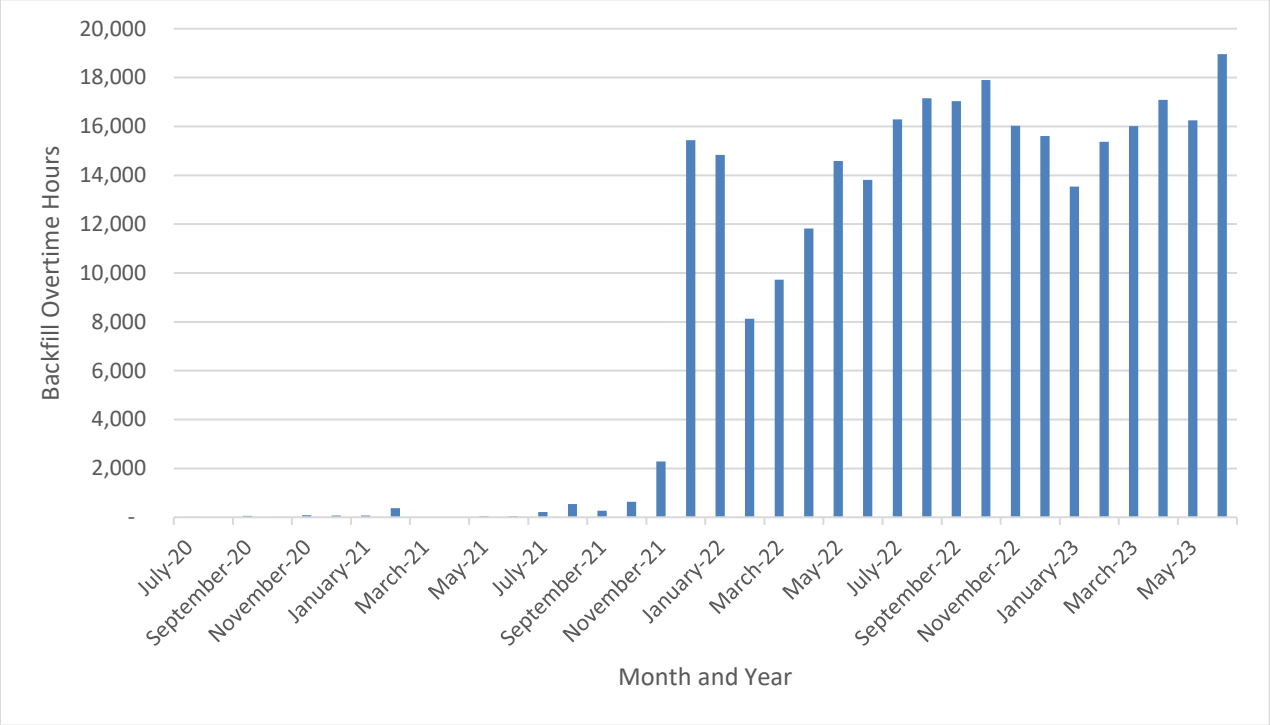
SFPD officers' ability to earn compensatory time off, rather than pay, for overtime creates an ongoing and compounding staffing liability and increases the costs of overtime for SFPD and the City. SFPD's current practice permits an officer who works 10 hours of overtime to choose to earn 15 hours of compensatory time off rather than pay, which could require another officer to work 15 hours of overtime to backfill that absence. We recommend that SFPD reduce its need for backfill overtime by establishing reasonable limitations on sworn staff's ability to earn or use compensatory time off when the Department faces staffing shortages severe enough to require backfill overtime. These restrictions would not limit officers' ability to use other types of earned leave, such as vacation and holiday days.

The Use of Patrol Backfill Overtime

As discussed in the Introduction to this report, the San Francisco Police Department (SFPD)'s use of backfill overtime was the largest single cause of the increase in General Fund overtime hours between FY 2018-19 and FY 2022-23. SFPD has used backfill overtime to meet minimum staffing levels and provide patrol coverage and 911 response as officer staffing at district stations has declined. Backfill overtime is typically worked as a 10-hour shift on an officer's day off or as a four- to six-hour shift before or after their watch (also referred to as being "held over").

Growth in SFPD's use of backfill overtime since FY 2020-21 is shown in Exhibit 3.1 below. The most significant increase was in late 2021, when backfill overtime grew from 2,288 hours in November 2021 to 15,431 hours in December 2021.

Exhibit 3.1: Patrol Backfill Overtime Hours, FY 2020-21 to FY 2022-23



Source: SFPD payroll data.

Backfill Overtime Used for Patrol and Non-Patrol Assignments

In Field Operations Bureau directions to district stations and division commanders, the stated purpose of patrol backfill overtime is to ensure stations meet minimum staffing for their daily watch schedules. Stations are directed to prioritize car sector patrol over other non-patrol assignments and to reassign officers from other assignments to cover car sector patrol. However, our analysis of SFPD payroll data found that in FY 2022-23, 25,112 backfill hours, or 13 percent, were worked for non-patrol activities, such as housing units, tactical deployments, and non-station field operations, according to radio unit codes associated with the overtime.

As shown in Exhibit 3.2 below, according to radio unit codes associated with the overtime, of the 197,211 backfill overtime hours recorded in FY 2022-23, 155,309, or 79 percent, were worked in

sector patrol (motorized patrol units), station assignments (station keeper[1] and station duty[2]), and patrol supervision (patrol sergeants and lieutenants). Another 8,286 hours, or four percent of total FY 2022-23 backfill hours, were worked in non-patrol tactical deployment squads, and 7,799 hours, another four percent, were worked in non-station field operations or investigations. Based on a review of the overtime card comment field, these non-station field operations hours were primarily worked for the Healthy Streets Operation Center on homeless encampment resolutions. SFPD also used backfill overtime to staff foot and bicycle units and station housing units.

Nine percent of backfill overtime hours had no radio unit code associated with the overtime. The radio unit code indicates the location of the work (Bayview Station, Chief's Office, Tactical Special Operations, etc.) and the function performed (motorized patrol, plainclothes unit, bicycle unit, etc.). A review of the comment field for the overtime hours missing a radio unit indicates that these hours were worked for a combination of patrol backfill and other functions.

Exhibit 3.2: Backfill Overtime Use by Radio Unit, FY 2018-19 to FY 2022-23

	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2022-23 % of total
Station and sector patrol*	**131**	**34**	**408**	**63,102**	**155,309**	**79%**
Non-patrol subtotal	**2**	**-**	**86**	**19,638**	**25,112**	**13%**
Squad on tactical deployment	*2*	*-*	*-*	*9,973*	*8,286*	*4%*
*Non-station assignments***	*-*	*-*	*80*	*10*	*7,799*	*4%*
Foot beat/bicycle units	*-*	*-*	*-*	*7,009*	*4,728*	*2%*
Station housing units	*-*	*-*	*6*	*1,019*	*1,358*	*1%*
Other station assignment	*-*	*-*	*-*	*1,628*	*2,942*	*1%*
No unit code	**13**	**12**	**246**	**9,542**	**16,790**	**9%**
Total	**146**	**45**	**740**	**92,282**	**197,211**	**100%**

Source: SFPD payroll data. Unit assigned by BLA based on radio unit field. Percentages may not add due to rounding.
*Station and patrol includes sector patrol, station duty, station keeper, and patrol supervision (patrol sergeants, lieutenants, and captains).
**Primarily Field Operations Bureau Headquarters and HSOC.

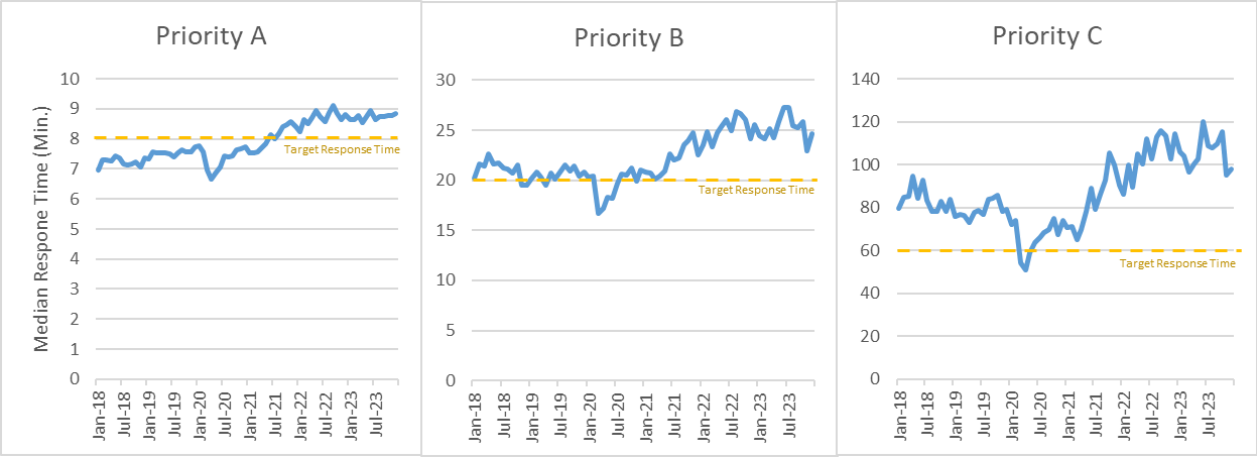
A sample review of the officer comment field for non-patrol backfill overtime hours was sometimes, but not always, sufficient to confirm that the overtime was not worked for patrol

[1] The station keeper is the officer assigned to manage the district station business office, keep records, take bail, maintain property, and book prisoners.
[2] The individual assigned to station duty answers the telephone, prepares reports and provides information to the public, and monitors the police radio. Station duty may be worked by an officer or by a civilian police services aide.

backfill. For example, comments such as "HSOC Backfill PM Resolution" or "Footbeat backfill" confirm that the backfill overtime was worked for a Healthy Streets Operations Center homeless encampment resolution or a foot beat, respectively, and not car sector patrol. However, some comments indicate that the overtime was worked for patrol, despite the radio code indicating a non-patrol function. Overall, most of the comments simply state "Backfill," which does not indicate whether or not the backfill was for sector patrol.

Backfill hours that were worked for non-patrol assignments had no established minimum staffing levels for these functions. Although officers in these non-patrol assignments may respond to 911 calls and other calls for service (for example, a foot beat unit may respond to a call in a designated beat area), it is not their primary responsibility to do so. As shown in Exhibit 3.3 below, 911 response times have been increasing citywide since at least 2020 and are above the City's target for all three priority levels, despite SFPD's use of 63,102 hours of patrol backfill hours in FY 2021-22 and 155,309 hours in FY 2022-23.[3]

Exhibit 3.3: 911 Response Times, CY 2018 to 2023



Source: San Francisco Public Safety scorecard.

To improve tracking, reporting, and accountability, and to ensure that patrol backfill overtime and 911 response is prioritized, we recommend that SFPD track and report patrol backfill and non-patrol backfill overtime separately and establish minimum staffing guidelines for non-patrol assignments. All backfill overtime hours should be required to have a unit code associated with the time worked. On an ongoing basis, SFPD should audit and review use of the non-patrol backfill

[3] In addition to patrol backfill overtime hours, 911 response times are affected by multiple other external factors, including call volume, call type, traffic patterns, and regular patrol hours/station staffing levels.

overtime to verify whether the use of backfill overtime was appropriate for that assignment dependent on Citywide staffing needs.

Patrol Minimum Staffing Levels

The minimum levels to which stations are directed to backfill changed five times between January 2022 and March 2023, as shown in Exhibit 3.4 below. Minimum officer staffing levels decreased at each station by between 20 and 38 percent over the 14-month period. In general, the most significant change occurred in April 2022, when SFPD reduced staffing for the 11am watch, and then in December 2022 when the 11am watch was eliminated.

Exhibit 3.4: Changes in Daily Minimum Officer Staffing Levels, January 2022 to March 2023

	Jan. 2022	April 2022	Dec. 2022	March 1, 2023	March 20, 2023	*% Change*
Central	40	33	27	27*	25	*-38%*
Southern	43	37	27	27	27	*-37%*
Bayview	42	31	27	27	27	*-36%*
Mission	43	33	27	27	27	*-37%*
Northern	41	33	28	28	28	*-32%*
Park	25	20	20	19*	18	*-28%*
Richmond	25	20	21	20	20	*-20%*
Ingleside	41	30	27	27	27	*-34%*
Taraval	30	27	22	22	22	*-27%*
Tenderloin	36	31	28	28	28	*-22%*

Source: Field Operations Bureau memos. Figures are sums of minimum staffing levels per watch (for example, at Central Station in January 2022, minimum staffing levels were 10 officers on the day watch, eight on the 11am watch, 11 on the swing watch, and 11 on the midnight watch, for a total of 40 officers per day). Figures do not include sergeants (generally two per watch).

*Central Station and Park Station had handwritten changes on the March 1, 2022 memo. This table reports the printed numbers, rather than handwritten numbers.

According to SFPD Field Operations Bureau, there is no formal methodology or staffing analysis that determines these minimum staffing numbers. Field Operations Bureau sets these numbers primarily based on the number of sectors in a district, the number of watches covered, and institutional knowledge and experience with the needs of each district. For example, a six-sector district like Northern would need 12 officers (two per sector car) to patrol all six sectors plus one station keeper for a total of 13 officers to fully staff a watch. A general "rule of thumb" was that minimum staffing levels should be 80 percent of full staffing,[4] or in this example approximately 9.6 patrol officers plus one station keeper per watch. However, Field Operations Bureau also adjusted minimum staffing levels based upon the individual needs of each station: for example,

[4] In December 2022, Field Operations Bureau directed station captains and division commanders that this 80 percent rule was no longer in effect.

one station might need higher staffing levels for the midnight watch, and the minimum would be increased accordingly. 11am watches, which overlap entirely with day watches and swing watches, were usually staffed at lower levels than other watches.

Patrol Backfill Overtime Management Practices

SFPD needs to improve its management and budgeting practices for patrol backfill overtime in order to ensure that only necessary backfill overtime is worked and that stations are able to adequately staff their watches. Following SFPD's unsuccessful effort to manage backfill overtime centrally (summarized below), as of September 2023 backfill management is decentralized, based primarily on SFPD's overtime budget, and requires manual daily monitoring. Each district station captain is responsible for their station's backfill overtime assignments, along with all other overtime for station-specific initiatives, as part of their station's overall bi-weekly overtime budget. Captains are given their overtime budget, which is calculated as a portion of SFPD's total overtime budget and based on historical usage, and they allocate overtime hours for different assignments (sector patrol, special assignments, plainclothes or foot beat units, etc.) at their discretion, monitored by the Overtime Compliance Unit within Field Operations Bureau.

Although allocating overtime assignments based on a budget may be effective in ensuring that that budget is not exceeded, the practice is less effective in ensuring that only *necessary* backfill overtime is worked and that backfill overtime is prioritized for sector patrol. As discussed in more detail later in this section, SFPD's FY 2021-22 and FY 2022-23 backfill overtime practices resulted in uneven use of backfill, with too much backfill overtime worked at some stations on some days and not enough worked at other stations on other days. In addition, as mentioned above, 13 percent of SFPD's FY 2022-23 backfill overtime was worked for non-patrol assignments.

In order to be an effective management tool, SFPD's budget for backfill overtime should be based on a staffing model that calculates backfill overtime needs according to station workload, actual staffing levels, planned and unplanned time off/non-working time (for sick leave, vacation, training, etc.), and anticipated staffing changes (hires and separations). In other words, the backfill overtime budget should reflect what stations *should* spend on backfill overtime in the coming year, not simply what they *would* spend if trends continue. Although SFPD's 2023 Staffing Analysis uses a workload-based methodology to determine needed staffing levels at district stations based on calls for service and other metrics, the analysis does not address how SFPD can meet those needs using backfill overtime or how much overtime each station should be allocated.

We recommend that SFPD annually prepare a detailed patrol staffing model, based on Field Operations Bureau minimum staffing levels, SFPD's annual Staffing Analysis, anticipated hires and separations, and historical leave and absence (non-working time) rates, to calculate the backfill

overtime budget for each district station. This information should be included as part of the Department's annual budget presentations to the Police Commission and the Board of Supervisors. An example of such a staffing calculation, as recommended in the *Staffing Analysis Workbook for Jails* issued by the U.S. Department of Justice National Institute of Corrections, is included in Appendix A to this report. Jails use "fixed post" staffing models that require a constant level of minimum staffing and operate 24/7, similar to SFPD's patrol minimum staffing levels. Like SFPD patrol, jails are also high-risk settings, have fluctuating workloads, and require relief or backfill staffing when regularly-scheduled employees are absent.

Past Patrol Backfill Overtime Management Practices

Prior to March 2023, patrol backfill management was decentralized, and individual district stations were responsible for assigning backfill overtime to ensure each station met its minimum staffing levels for patrol. In March 2023, SFPD switched to a centralized overtime management system that was intended to assign backfill overtime shifts in a fair and consistent process. As discussed in more detail below, this centralized management system was overall unsuccessful, as described in more detail below. In September 2023, SFPD halted centralized patrol backfill management and returned this responsibility to SFPD district stations and Field Operations Bureau.

Key changes in SFPD's practices for patrol backfill management are summarized below.

- On **January 21, 2022**, SFPD Field Operations Bureau generated a document (not on official letterhead) that established minimum staffing levels for each station and each watch and gave permission to stations to use backfill overtime to meet these levels. On **April 25, 2022**, Field Operations Bureau revised these minimum staffing levels. Across all stations, the April 2022 revised minimum staffing levels were lower than the levels established in January 2022. (Changes in minimum staffing levels are discussed in more detail later in this section.) Neither the January nor the April 2022 document established parameters for how backfill assignments should be determined (such as seniority, regular watch assignment, or another process), and individual district stations were responsible for their own backfill assignments.
- On **December 8, 2022**, SFPD Field Operations Bureau issued a Memorandum to station captains and division commanders outlining the procedure for backfill in greater detail and revising minimum staffing levels again. Across all stations, the December 2022 revised minimum staffing levels were lower than the levels established in April 2022, and the 11am watch was eliminated. The Memorandum did not establish a specific process for

selecting officers for backfill overtime and stated only that "Platoon Commanders shall fill it using a fair and consistent process" and that "all station Q2s [officers] shall be utilized."

- Also on **December 8, 2022**, the Police Department and the Police Officers' Association entered into a side letter agreement that established protocols to assign mandatory backfill overtime in a "fair, equitable, and transparent way." The side letter agreement required the Police Department to assign two members to the Staffing and Deployment Unit to oversee mandatory overtime. The side letter agreement also included the same minimum staffing levels that were established in the December 8, 2022 Field Operations Bureau Memorandum.
- On **March 1, 2023**, SFPD Field Operations Bureau issued a Memorandum that updated station backfill guidelines, revised minimum staffing levels, and established maximum staffing levels. On **March 20, 2023**, Field Operations Bureau issued another Memorandum that amended these guidelines and staffing levels. The March 20, 2023 minimum staffing levels were generally the same as the December 8, 2022 minimum staffing levels except in three cases.
- Beginning **March 23, 2023**, SFPD switched to a centralized system of backfill overtime management overseen by the Staffing and Deployment Unit, as required in the side letter agreement with the Police Officers' Association. The centralized system is discussed in more detail below.
- On **September 13, 2023**, SDU ceased assigning backfill overtime centrally, and this responsibility returned to district stations and Field Operations Bureau.
- On **September 15, 2023**, Field Operations Bureau reiterated each station's minimum staffing numbers (unchanged since the March 20, 2023 Memorandum) and established discretionary time off limits.
- Effective **November 1, 2023**, SFPD prematurely terminated the mandatory overtime side letter agreement with the Police Officers' Association, which would otherwise have remained in effect until December 8, 2023.
- Since September 2023, district stations are once again responsible for managing backfill overtime assignments, overseen by Field Operations Bureau. The Overtime Compliance Unit within Field Operations Bureau conducts daily monitoring of overtime and staffing levels at district stations.

Unsuccessful Centralization of Backfill Management

The side letter agreement between the City and the Police Officers' Association (in effect from December 8, 2022 through November 1, 2023) required SFPD to assign members to the Staffing and Deployment Unit (SDU) to oversee a centralized system of mandatory backfill overtime

assignments. This centralized system was in effect for slightly less than six months, from March 23, 2023 through September 13, 2023.

While the system was in effect, SDU used a department-wide seniority list of all full-duty SFPD sergeants and officers, informally known as the "wheel," to assign backfill overtime. When district stations requested backfill overtime, SDU selected the officers and sergeants who were available in order of reverse seniority on the wheel and notified the individual and their commanding officer via email. Once an officer or sergeant was selected and fulfilled their overtime shift, that individual would not be selected again until all other available individuals had been selected and fulfilled their shifts, and then the cycle would repeat. According to SFPD's 2023 Staffing Analysis, the process of centrally assigning backfill overtime was labor-intensive and manually executed by one sergeant and three officers, and SDU did not have the ability to use scheduling software or technology.

Based on conversations between the audit team and SFPD personnel, a lack of accountability made this centralized system unsuccessful. An officer could call out sick to a mandatory backfill assignment because SDU, the central unit responsible or the assignment, lacked the authority of a commanding officer, and officers did not respect or honor the system. In addition, the wheel did not give officers credit for voluntary overtime sign-ups: if an officer volunteered for an overtime shift one day, they could still be called up on the wheel the following day for mandatory overtime, which created a dis-incentive for officers to volunteer for overtime. The centralized wheel system also resulted in officers working backfill shifts in districts they may have been unfamiliar with, and patrol officers on their days off could get called in to work in a different district other than their own.

SFPD ceased operating the wheel in September 2023, and as discussed above, responsibility for backfill overtime assignments returned to Field Operations Bureau and district stations. The Overtime Compliance Unit within Field Operations Bureau conducts daily monitoring of overtime and staffing levels at district stations and assists with managing the staffing for special events.

Uneven Use of Backfill Overtime

Over the course of our audit scope, we found that SFPD's backfill overtime management and assignment practices resulted in uneven use of backfill, with too much backfill overtime worked at some stations on some days and not enough worked at other stations on other days. For this analysis, we calculated the total hours per day worked at each station by officers assigned to sector patrol or station keeper/station duty on either regular time or backfill overtime, and compared that total to the number of officer hours that were needed to meet that station's minimum staffing levels. For example, in February 2023 the minimum staffing at Bayview Station

was eight officers for the day watch, nine officers for the swing watch, and 10 officers for the midnight watch, or 27 officers total working full shifts. Because each shift is 10 hours long, the total hours required to fully staff each watch at Bayview Station for one day is 270 hours. We then compared actual hours worked in sector patrol or station keeper/station duty on either regular time or backfill overtime to evaluate for three scenarios:

- When a station already met or exceeded its daily minimum staffing on regular time, but still used backfill patrol overtime hours in excess the established minimum staffing level;
- When a station did not meet its daily minimum staffing on regular time and used backfill patrol overtime hours to not only meet but exceed minimum staffing; and
- When a station did not meet its daily minimum staffing using either regular time or backfill patrol overtime, and as a result was understaffed for that day.

As shown in Exhibit 3.5 below, during one randomly-selected 14-day pay period in February 2023, we found:

- Officers at SFPD district stations worked 1,052 cumulative hours of patrol backfill overtime even when daily minimum staffing levels had already been met with regular time.
- When a station did not meet its minimum staffing on regular time, stations used a total of 428 cumulative backfill hours to not only meet but exceed daily minimum staffing levels. (The 428 total does not include the hours needed to bring the station up to its minimum; we only counted hours that were worked in excess of the minimum.)
    - Together, these two calculations yield a total of 1,479 cumulative backfill hours worked in this pay period in excess of what was needed to meet minimum staffing levels.
- Stations did not meet daily minimum staffing levels (i.e., were understaffed) by a total of 1,374 cumulative hours over the pay period.
- Over the entire pay period, district stations worked a net total of 106 hours of backfill in excess of their daily staffing minimums (calculated on a per-day basis). Overall, the difference between the daily surplus and the deficit totals indicates that backfill overtime hours could have been better distributed to avoid overstaffing on some days and understaffing on other days.

This analysis is limited by the fact that not all backfill overtime hours have radio unit codes associated with the time worked. To be conservative, we counted only backfill overtime and regular-duty time that also had a radio unit code indicating the time was for officer patrol or station keeper/station duty. However, as indicated in Exhibit 3.2 earlier in this report, nine percent of backfill overtime hours had no radio unit code associated with them, and a review of

comments on these hours shows that the hours were worked for both patrol and non-patrol functions. In addition, we observed that some stations, particularly the Tenderloin, had incomplete radio unit codes indicating that the time was worked at the station but not for what function. As a result, assuming that at least some of the regular and backfill hours without complete radio codes were worked for patrol, this analysis may underestimate the frequency and amount of overtime hours worked in excess of minimum staffing levels, and overestimate the frequency and amount of overtime hours worked in deficit of minimum staffing levels.

Exhibit 3.5: Backfill Hours Worked at Stations by Officers, Pay Period Ending 2/3/2023

		Minimum Met with Regular Time	Minimum Unmet with Regular Time but Exceeded with Backfill		Minimum Not Met with Regular or Backfill	Net Pay Period Backfill Staffing
	Biweekly Min. Staffing Hours	Surplus Backfill Hours Worked		Total Surplus Backfill Hours	Deficit Backfill Hours Needed	
Central	3,780	84	18	**102**	**(178)**	**(76)**
Southern	3,780	62	-	**62**	**(51)**	**11**
Bayview	3,780	129	114	**243**	**(17)**	**226**
Mission	3,780	66	-	**66**	**(346)**	**(280)**
Northern	3,920	144	-	**144**	**(253)**	**(109)**
Park	2,800	31	19	**50**	**(114)**	**(64)**
Richmond	2,940	-	36	**36**	**(220)**	**(184)**
Ingleside	3,780	421	64	**485**	**-**	**485**
Taraval	3,080	79	177	**256**	**(6)**	**250**
Tenderloin	3,920	36	-	**36**	**(190)**	**(154)**
Total	**n/a**	**1,052**	**428**	**1,479**	**(1,374)**	**106**

Source: BLA analysis of payroll data, pay period ending 2/3/2023. Includes only officer hours and staffing.

Exhibit 3.6 below summarizes the results of this analysis over a sample of three pay periods. In August 2022, when daily minimum staffing levels were higher, stations generally did not meet their targets and overall operated at a deficit, although we did identify some backfill hours worked in excess of the daily minimums. In February and April 2023, after minimum staffing levels had been lowered, we found that stations were overall using more backfill overtime than was needed to meet minimum staffing levels, and backfill overtime hours could have been better distributed to avoid overstaffing on some days (indicated by the surplus hours) and understaffing on other days (indicated by the deficit hours). As discussed above, this analysis is limited by inconsistent use of radio unit codes, and this analysis may underestimate the frequency and amount of overtime hours worked in excess of minimum staffing levels and overestimate the frequency and amount of overtime hours worked in deficit of minimum staffing levels.

Exhibit 3.6: Backfill Hours Worked at Stations by Officers, Selected Pay Periods

	Pay Period Ending 8/19/2022 Cumulative Backfill Hours			Pay Period Ending 2/3/2023 Cumulative Backfill Hours			Pay Period Ending 4/14/2023 Cumulative Backfill Hours		
	Surplus	Deficit	**Net**	Surplus	Deficit	**Net**	Surplus	Deficit	**Net**
Central	-	(650)	**(650)**	102	(178)	**(76)**	14	(86)	**(72)**
Southern	-	(715)	**(715)**	62	(51)	**11**	152	(117)	**35**
Bayview	18	(469)	**(451)**	243	(17)	**226**	153	(44)	**110**
Mission	32	(564)	**(532)**	66	(346)	**(280)**	183	(12)	**171**
Northern	23	(412)	**(389)**	144	(253)	**(109)**	381	(43)	**338**
Park	131	(72)	**59**	50	(114)	**(64)**	237	-	**237**
Richmond	26	(237)	**(211)**	36	(220)	**(184)**	468	(21)	**447**
Ingleside	241	(179)	**62**	485	-	**485**	407	-	**407**
Taraval	6	(435)	**(429)**	256	(6)	**250**	389	(26)	**363**
Tenderloin	2	(842)	**(840)**	36	(190)	**(154)**	18	(361)	**(343)**
Total	**479**	**(4,574)**	**(4,096)**	**1,479**	**(1,374)**	**106**	**2,399**	**(709)**	**1,691**

Source: BLA analysis of payroll data. Includes only officer hours and staffing.

As mentioned earlier in this section, the Overtime Compliance Unit in Field Operations Bureau now conducts daily monitoring to track whether stations are meeting minimum staffing levels. Before future station watch sign-ups, Field Operations Bureau should identify stations that regularly exceeded or failed to meet minimum staffing levels during the previous six-month period and make reasonable attempts to adjust station and watch staffing levels to improve patrol coverage. As recommended in *Section 1: Violations of Overtime Limits and Excessive Use of Overtime* of this report, and in order to ensure consistent patrol coverage, Field Operations Bureau should also develop a system that requires captains to pre-schedule backfill overtime to the largest extent possible.

Limits on Compensatory Time Off Could Reduce Backfill

SFPD could reduce its need for backfill overtime by establishing reasonable limitations on sworn staff's ability to earn or use compensatory time off. Under the terms of the Memorandum of Understanding between the City and the Police Officers' Association, SFPD sworn staff may request to earn compensatory time off rather than pay at the same one-and-one-half times rate for overtime hours worked. In other words, an officer who works 10 hours of overtime may choose to earn 15 hours of compensatory time off instead of 10 hours of pay at their one-and-a-half-times rate. Effective 2010, employees may not accumulate a balance of more than 300 hours, or 7.5 weeks, of compensatory time off. This compensatory time off is separate from other discretionary time off categories that sworn staff may earn and use, including vacation days, holiday days, and fitness time.

When SFPD must use backfill overtime to meet minimum staffing levels, awarding compensatory time off for overtime worked increases the cost of the overtime and creates an ongoing and

compounding staffing liability. An officer who works 10 hours of overtime for compensatory time off earns 15 hours of leave; when that officer takes that leave, it could require another officer (or two officers) to work 15 hours of overtime to backfill that absence and potentially earn 22.5 hours of time off, or overtime pay for 15 hours rather than the original 10 hours.

As shown in Exhibit 3.7 below, in each year between FY 2018-19 and FY 2022-23, SFPD sworn staff worked between 14,615 and 21,912 hours of overtime for which they requested compensatory time off. These hours represent a total of between 21,992 and 32,868 hours of time off earned at the one-and-a-half-times rate.

Exhibit 3.7: Overtime Worked for Compensatory Time Off, FY 2018-19 to FY 2022-23

	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	Total
Overtime worked for comp. time	21,912	21,378	14,615	15,995	18,901	92,800
Equivalent time off earned	32,868	32,067	21,923	23,992	28,351	139,200

Source: SFPD payroll data, all funds.

SFPD could reduce its need for backfill overtime by negotiating with the Police Officers' Association to establish reasonable limits on sworn staff's ability to earn and use compensatory time off during time periods when the Department faces staffing shortages severe enough to require backfill overtime.[5] These limits could include the following restrictions:

- SFPD sworn staff may not earn compensatory time off, and must instead earn overtime pay, for overtime worked during six-month periods during which the Department uses overtime for patrol backfill, and/or
- SFPD sworn staff who are assigned to patrol functions may not use earned compensatory time off during six-month periods during which the Department uses overtime for patrol backfill.

Implementation of these recommendations would require changes to the City's Memorandum of Understanding with the Police Officers' Association. These restrictions would not affect employees' ability to earn and use other types of earned leave, including vacation and holiday days.

[5] Such restrictions would not be unprecedented. In 2010, per the labor agreement with Police Officers' Association, the maximum amount of compensatory time officers could earn was reduced from 480 to 300 hours.

Flexible Watch Assignment Committee

The 2018-2023 Memorandum of Understanding between the City and the Police Officers' Association established a Joint Labor-Management Committee to study a flexible watch assignment pilot program. Such a pilot program could have explored opportunities to reduce overtime by allowing SFPD to adjust watch assignments to re-assign officers to shifts with higher staffing needs (due to time off, special events, or other factors). Under the current terms of the 2023-2026 Memorandum of Understanding, sworn staff are assigned to a station or unit according to a semi-annual seniority sign-up, and SFPD may not change an employee's regular watch more than three hours to avoid the payment of overtime for non-emergency special event assignments.

Although the Committee was to issue a written report with recommendations on the feasibility of a flexible watch assignment pilot program to the Chief of Police by May 30, 2019, SFPD did not produce a copy of the report in response to our request and did not confirm whether the Joint Labor-Management Committee ever convened. To explore the possibility of flexible watch assignments to reduce potential overtime needs, we recommend that SFPD implement a flexible watch assignment pilot program and negotiate with the Police Officers' Association to allow SFPD to flexibly adjust watch assignments and re-assign officers to shifts with higher staffing needs.

Conclusion

SFPD's backfill overtime management practices changed several times since the Department started relying on backfill to meet minimum staffing levels in December 2021. Past management practices resulted in uneven station coverage and the use of backfill overtime for non-patrol activities for which there are no established staffing minimums. Overall, there are opportunities to (a) improve SFPD's management of backfill overtime to ensure stations have adequate patrol coverage for 911 response, and (b) reduce its need for backfill overtime by establishing reasonable limitations on sworn staff's ability to earn or use compensatory time off and increasing its flexibility to adjust watch assignments.

Recommendations

The Chief of Police of the San Francisco Police Department should:

3.1 Require all bureaus and units of the Operations Division to track and report patrol backfill and non-patrol backfill overtime separately, and require all backfill overtime hours to have a radio unit code associated with the time worked.

3.2 Establish minimum staffing guidelines to backfill non-patrol assignments.

3.3 On an ongoing basis, direct the Overtime Compliance Unit to audit and review use of non-patrol backfill overtime to verify whether the use of backfill overtime was appropriate for that assignment dependent on Citywide staffing needs.

3.4 Before future station watch sign-ups, identify stations that regularly exceeded or failed to meet minimum staffing levels during the previous six-month period and make reasonable attempts to adjust station and watch staffing levels to improve patrol coverage.

3.5 Annually prepare a detailed patrol staffing model, using actual and projected sworn staffing, time off, information from station watch assignments, and the Department's annual Staffing Analysis, to calculate the appropriate backfill overtime budget for each district station and the Department overall, and include this information in the Department's annual budget presentations to the Police Commission and the Board of Supervisors.

3.6 Negotiate with the Police Officers' Association to limit sworn staff's ability to earn and use compensatory time off during six-month periods during which the Department uses overtime for patrol backfill.

3.7 Implement a flexible watch assignment pilot program and negotiate with the Police Officers' Association to allow SFPD to flexibly adjust watch assignments and re-assign officers to shifts with higher staffing needs.

Benefits and Costs

Implementation of the proposed recommendations would require use of staff time but can be accomplished with existing resources. These recommendations would prioritize the use of backfill overtime for patrol functions and 911 response, could reduce SFPD's overall use of backfill overtime, and would ensure that SFPD's backfill overtime budget is appropriately allocated to stations and that it is an effective management tool and control. Negotiating with the Police Officers' Association to (a) establish limits on sworn staff's ability to earn and use compensatory time off and (b) increase SFPD's ability to flexibly re-assign officers to shifts with higher staffing needs would generate cost savings for the City by reducing SFPD's need for backfill overtime.

4. The Use of Overtime for Special Initiatives

The San Francisco Police Department (SFPD) has deployed significant police resources in designated areas to carry out targeted initiatives staffed using overtime, including the Union Square Safe Shopper Initiative, the Tenderloin Triangle Safety Plan, and Tourism Deployment. However, the Department not has not established adequate performance metrics or criteria to evaluate the effectiveness of these initiatives. SFPD does not have enough staffing to execute these initiatives using regular-duty officers, and as a result, these initiatives are one of the contributing factors in the Department's significant growth in overtime from FY 2018-19 through FY 2022-23: SFPD worked 319,945 overtime hours under the special initiatives reviewed for this report during the audit period at a total estimated cost to the General Fund of $30,824,783. During this same time period, as police presence and resources in specific areas of the City increased, other areas experienced reductions in police service: from FY 2018-19 to FY 2022-23, staffing levels at SFPD district stations have decreased and 911 response times have increased.

In addition, we reviewed the use of overtime for two special initiatives: (a) the Union Square Safe Shopper Initiative, which provides additional police staffing in Union Square to deter retail theft and other crime, and (b) the Tenderloin Triangle Initiative, which provides additional police staffing in the Tenderloin neighborhood to meet various needs. In both cases, we did not find a significant improvement in response times to 911 calls or trends in crime.

SFPD has not established criteria to (a) evaluate the effectiveness of these initiatives and whether they are worth the costs of overtime and officer fatigue; (b) guide decision-makers on appropriate levels of or need for police presence and staffing; or (c) scale down or conclude these initiatives once they have achieved their goals. SFPD should establish clear standards and criteria for allocating overtime hours to special initiatives and improve its monitoring and evaluation practices of overtime tasks that consume a significant amount of SFPD resources.

An Overview of Special Initiatives Done on Overtime

As discussed in the Introduction to this report, extended work week overtime was the most significant cause of the increase in overtime at the San Francisco Police Department (SFPD) between FY 2018-19 and FY 2022-23. In FY 2022-23, extended work week overtime accounted for 553,421 of SFPD's total 733,823 General Fund overtime hours, or 77 percent. In addition to backfill overtime, which is discussed in more detail in *Section 3: Management of Backfill Overtime*, SFPD uses extended work week overtime to carry out targeted initiatives within designated geographic areas of the City. Several of these targeted overtime initiatives are the

result of direction from City officials in collaboration with SFPD in response to public safety concerns that necessitate SFPD attention in excess of regular duty assignments. This section of the report primarily evaluates three initiatives with significant impact on SFPD overtime usage over the course of the FY 2018-19 to FY 2022-23 audit period: Union Square Safe Shopper, the Tenderloin Triangle initiative, and Tourism Deployment.

Union Square Safe Shopper

The Union Square Safe Shopper initiative was implemented by SFPD in November 2021 following a high-profile string of organized retail theft and vandalism incidents that took place in and around Union Square. The primary objective of this initiative, which is staffed exclusively using overtime hours, is to prevent and deter crime by utilizing highly visible uniformed foot patrol within the footprint of Union Square and its event spaces. Safe Shopper's other objectives are to deploy pre-designated plans in the event of large-scale retail theft or other criminal incident, rapidly implement partial or full street closures on an as-needed basis, facilitate peaceful First Amendment activities, and maintain positive community engagement. SFPD maintains continuous deployment of a mobile command unit out of Union Square Plaza as a resource to the Safe Shopper foot patrol. Officers assigned to the Safe Shopper initiative may respond to 911 calls.

Tenderloin Triangle

The Mayor implemented the Tenderloin Triangle initiative in May 2021 to provide safe passage through priority areas in the Tenderloin District encompassing Westfield Mall, UN Plaza, and hotspot intersections. The initiative was designed not only to enhance support in these priority areas but also to meet ongoing and urgent directives from the Mayor and the Board of Supervisors, which includes close monitoring of violent crime and drug markets within the vicinity. Tenderloin Triangle is partially staffed through regular duty assignments and with overtime hours intended to supplement these efforts, as necessary. There is no operational documentation of these goals, and these statements are based on conversations with SFPD staff.[1]

Tourism Deployment

SFPD's Tourism Deployment initiative was launched in July 2021 at the direction of the Mayor. Like Union Square Safe Shopper, the approach to policing under this initiative is to increase uniformed presence in commercial corridors throughout the City to deter crime. Sworn staff working a Tourism shift are responsible for taking over regular duties within their assigned footprint which includes responding to 911 calls for service and managing all police incident

[1] SFPD does produce operational orders to authorize deployments, but the ones we reviewed did not contain specific activities or goal descriptions.

reports within the designated area. Like the Tenderloin Triangle initiative, there is no operational documentation of these goals, and these statements are based on conversations with SFPD staff.

The implementation of these special initiatives has contributed to the 189 percent increase in SFPD General Fund overtime usage over the audit period between FY 2018-19 and FY 2022-23. As shown in Exhibit 4.1 below, hours worked towards Tourism Deployment, Tenderloin Triangle, and Safe Shopper totaled 319,945 and the associated estimated cost of these three initiatives alone was $30,824,783 over the course of the audit period.

Exhibit 4.1: Resources and Costs of Special Initiatives, FY 2018-19 through FY 2022-23

	FY 2020-21	FY 2021-22	FY 2022-23	Total
Union Square Safe Shopper				
Hours	*n/a*	85,209	90,417	**175,626**
Est. Cost	*n/a*	$8,008,900	$9,388,766	**$17,397,666**
Tenderloin Triangle				
Hours	5,034	47,736	28,469	**81,239**
Est. Cost	$420,697	$4,198,920	$2,591,223	**$7,210,840**
Tourism Deployment				
Hours	*n/a*	34,762	28,318	**63,080**
Est. Cost	*n/a*	$3,318,277	$2,897,999	**$6,216,277**
Total				***$30,824,783***

Source: SFPD payroll data and BLA calculations.

Note: The hours totals for these three initiatives differ slightly from the totals presented in the Introduction to this report due to the inclusion of small amounts of other type of overtime worked (arrests, investigations, etc.) coded to these initiative index codes.

SFPD Does Not Have Sufficient Standards for Managing and Evaluating Overtime Hours towards Special Initiatives

Our audit fieldwork included interviews with the sworn staff responsible for administering San Francisco's special initiatives done on overtime. We also requested SFPD's planning materials, staffing models, evaluations, and assessments of these initiatives. Based on a review of the available materials and our interviews, we found that SFPD does not have sufficient internal controls in place to recruit for, assign, monitor, and evaluate these initiatives and their use of overtime hours in a way that is consistent with the published best practices of the International Association of Chiefs of Police (IACP) Model Overtime Policy.

Allocation and Recruitment

This phase of overtime administration refers to how many overtime hours are set aside for and ultimately allotted towards SFPD special initiatives. There is no clear policy or staffing model in place to guide SFPD supervising officers when assigning hours to these initiatives, and rather than

using public safety metrics or other predetermined criteria, station captains and lieutenants tend to manage overtime hours for special initiatives using:

- **Officer availability**: Supervising officers we spoke to noted that there has been a shift from involuntary overtime assignments to voluntary sign-ups in the last five years to address officer burnout. As such, all three overtime initiatives evaluated in this report section are filled based on the availability of officers seeking additional shiftwork, rather than a need identified by supervising officers. Furthermore, because there are more overtime opportunities relative to earlier years due to lower SFPD staffing levels, officers can be more selective with the shifts they take. As a result, more desirable assignments, such as Union Square Safe Shopper, fill shifts relatively easily while shifts allocated to the Tenderloin Triangle Initiative frequently go unfilled. As officer availability and desire to work overtime hours waxes and wanes throughout the week and the year, this system has created an arbitrary level of special initiative coverage and days worked that we observed within SFPD's payroll data.
- **Requests from City officials and local establishments**: Our interviews with supervising officers from the Tenderloin found that all decisions to allocate overtime resources came from requests external to the Department. Examples of requests include maintaining SFPD presence during a local event and deploying additional vehicles to patrol a block in the days following a criminal incident. We were told that requests for Tenderloin officers are never denied, however the extent and duration of SFPD presence is often less than requested.
- **Personal preferences**: Supervising officers cited different motivations and standards for allocating overtime shifts towards special initiatives. One supervisor informed us their main philosophy around overtime assignment was to protect City revenues and therefore they increased shift work on days there would be more shoppers on the ground, such as on weekends and over winter holidays.

Routine Monitoring and Evaluation

SFPD does not have a sufficient or consistent system of monitoring and evaluating these initiatives, the amount of overtime they require, and whether or not they are achieving their goals. SFPD's biweekly overtime reporting only includes overtime hours worked and associated costs, and our interviews with SFPD confirmed that these reports are primarily used to ensure resources dedicated to overtime initiatives are not exceeding the district stations' overtime budgets. Outside of financial monitoring, we did not find that SFPD management or the Crime

Strategies Division[2] tracked any performance metrics or public safety outcomes pertaining specifically to overtime initiatives in a way that affected operations, either to evaluate whether staffing levels were lower or higher than necessary or to evaluate whether the initiative was accomplishing its goals. In addition to the lack of routine monitoring, special overtime initiatives are also not evaluated on a periodic basis—internally or to an independent oversight body—to assess (a) whether initiatives' strategic plans need to be adjusted, or (b) whether goals have been accomplished and the initiative can be scaled down or ended. SFPD has a Crime Strategies Division that has a team of analysts to assess crime, but they are focused on violent crime trends and supporting the Investigations Bureau. The Crime Strategies Division has not been assessing the public safety impact of the overtime special initiatives.

The Department completed one evaluation of the Safe Shopper initiative as part of a staff briefing, which looked at two weeks in November 2021: the week before Safe Shopper was implemented and the week after. The Department's review of crime data found that crime decreased 82 percent, from 83 incidents to 15 incidents. However, this evaluation took place in the immediate aftermath of a high-profile retail theft blitz and thousands of additional hours of SFPD deployment. As shown later in this report section, both reported incidents and SFPD hours have since adjusted to levels that differ from November 2021 measures. The Department has not completed any other evaluation of the Safe Shopper initiative since, nor has it evaluated the effectiveness of the Tenderloin and Tourism initiatives.

By not monitoring the impact of these overtime initiatives beyond the quantity of hours worked, SFPD cannot reasonably evaluate the effectiveness of the labor and financial resources allocated. Furthermore, when these initiatives are launched without periodic review processes or strategic plans to scale back or integrate duties into regular work hours, these initiatives effectively turn routine police work into overtime tasks. We recommend that SFPD establish clear standards and criteria for allocating overtime hours to special initiatives and, as discussed in more detail below, establish a monitoring and cost-effectiveness analysis procedure.

Observed Public Safety Outcomes Do Not Justify Staffing Levels for Special Initiatives Using Overtime

Better monitoring and evaluation standards would be useful to improve public safety outcomes. Based on a preliminary assessment of overtime hours worked against a sample of public safety

[2] The Crime Strategies Division is comprised of analysts in partnership and support of sworn staff to develop crime reduction strategies.

metrics, we did not observe that SFPD presence using overtime hours influenced outcomes and would justify the overtime costs incurred.

For the purposes of our assessment, we chose to evaluate the following variables identified by published literature to be appropriate direct measures of police performance:

1. **911 Response Times to Priority A[3] and B[4] calls**: This metric represents the time elapsed between when a 911 call is made to the Department of Emergency Management and when SFPD arrives on scene. Response times are an established SFPD performance metric and we assume them to be a proxy of how efficiently SFPD is able to deploy resources in response to emergency situations. The data we present includes both dispatched calls for service, when an officer is dispatched to respond to a 911 call, and self-initiated calls for service, when an officer observes a crime in the field and responds. We separately reviewed response times excluding self-initiated calls and found that the results were consistent with the analyses presented in this report, which include both dispatched and self-initiated Priority A and B calls.
2. **Incident Reports**: This measurement consists of the number, location, and nature of incidents of crime that are reported to or reported by the SFPD. While incident reports do no perfectly capture all crime, we assume in this report that incident report volume is a measure of policing activity in an area, which is influenced by several factors including criminal activity and community reporting patterns. The data excludes citations and incidents involving juveniles and confidential records. As discussed below, incident reports are one of the metrics that the state requires SFPD to monitor for its Organized Retail Theft grant program, and SFPD used crime incident data in its one evaluation of the Safe Shopper program referenced above.

These data are not complete measurements of police performance or public safety. Alongside the data limitations noted above, conversations with SFPD staff and local businesses suggest potential data biases, including changes in the public's willingness to call 911 or report incidents of crime. Additionally, there is an inherent relationship between police presence and these metrics: increased police presence could correlate with an increase in 911 call and incident report volume if more officers are on the ground and available to self-initiate calls and take incident reports, or a decrease in these metrics if police presence deters crime and results in fewer calls

[3] Priority A calls are 911 calls are calls when there is present or imminent danger to life, major property damage, and/or suspect(s) of significant crimes may be in the area; when a major crime scene must be protected; when a juvenile is missing or involved in sexual abuse or assault; and when an elderly person is missing.
[4] Priority B calls are 911 calls where there is potential for damage to property; when the suspect may be in the area; or when the crime has just occurred.

or incidents. While best practices[5] in police performance measurement call for both direct indicators and indirect indicators, such as public perceptions of safety, this report takes an exploratory and illustrative approach to fill a gap in Departmental analysis. The following discussion focuses on key policing functions and assesses measurable outcomes localized to the areas serviced by overtime initiatives.

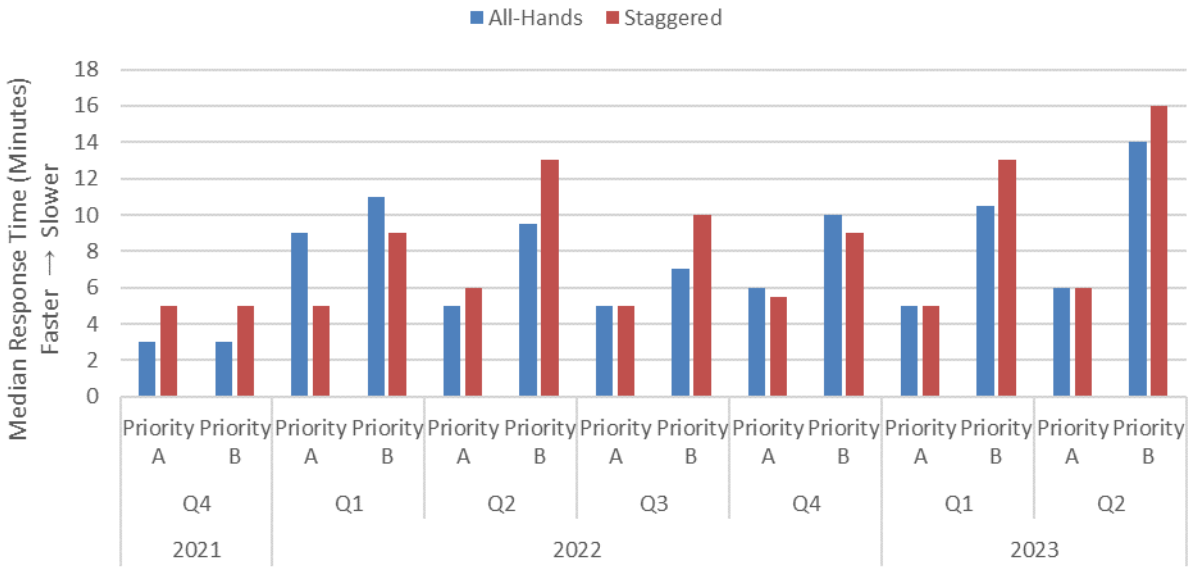
Union Square Safe Shopper

We did not find that SFPD responded to 911 calls for service within the footprint of Union Square faster on days with higher Safe Shopper overtime deployment. SFPD patrol officers and sergeants have their regular duty days staggered to ensure consistent and adequate coverage throughout the week. However, all sworn patrol staff are deployed to their regular duty assignments one undisclosed weekday each week. SFPD payroll data shows that significantly fewer overtime hours are worked on the Union Square Safe Shopper initiative on these "all-hands" deployment days relative to "staggered" deployment days, because officers are typically supplementing overtime hours before or after their regular duty assignments rather than committing to working an entire 10-hour Safe Shopper shift. According to SFPD staff, Union Square police presence is maintained throughout the week but regular duty deployment does not match the coverage available on other days. On a typical "staggered" day of the week, the average Safe Shopper shift is 9.6 hours long whereas the average Safe Shopper shift on an "all-hands" day is 1.5 hours. Just 1,800 hours, or one percent of the approximately 175,000 hours worked towards Union Square Safe Shopper during the audit period, were worked on "all-hands" days. This disparity in SFPD presence between days of the week allowed us to observe the impact of Union Square Safe Shopper deployment on public safety outcomes within the footprint of Union Square.

As shown in Exhibit 4.2 below, for all but two quarters following Union Square Safe Shopper implementation, median response times to Priority A 911 calls for service on staggered deployment days, which have more Union Square Safe Shopper Staffing, were often **the same or slower** than all-hands days through June 2023. In the first quarter of 2023, for example, a Priority A call made to 911 from Union Square had a median response time of five minutes regardless of whether additional officers were assigned to patrol the area as part of Union Square Safe Shopper. Response times were similarly unremarkable for Priority B calls: all but two of the seven observed quarters showed the same or slower response times for staggered days in which Union Square Safe Shopper had far greater deployment.

[5] We reviewed the following publications, among others: Maslov, A. *Measuring the performance of the police: The perspective of the public.* (2015); Sparrow, M. *Measuring performance in a modern police organization.* (2015).

Exhibit 4.2: Comparison of 911 Response Times in Union Square by Call Priority and Deployment Level, November 2021 through June 2023



Source: BLA analysis of SF Open Data Calls for Service (Closed).
*Staggered days have **higher** Safe Shopper overtime hours than All-Hands days.
**SF Open Data's 911 calls for service report includes location data which allowed us to exclusively report on calls made within the footprint of Union Square Safe Shopper.

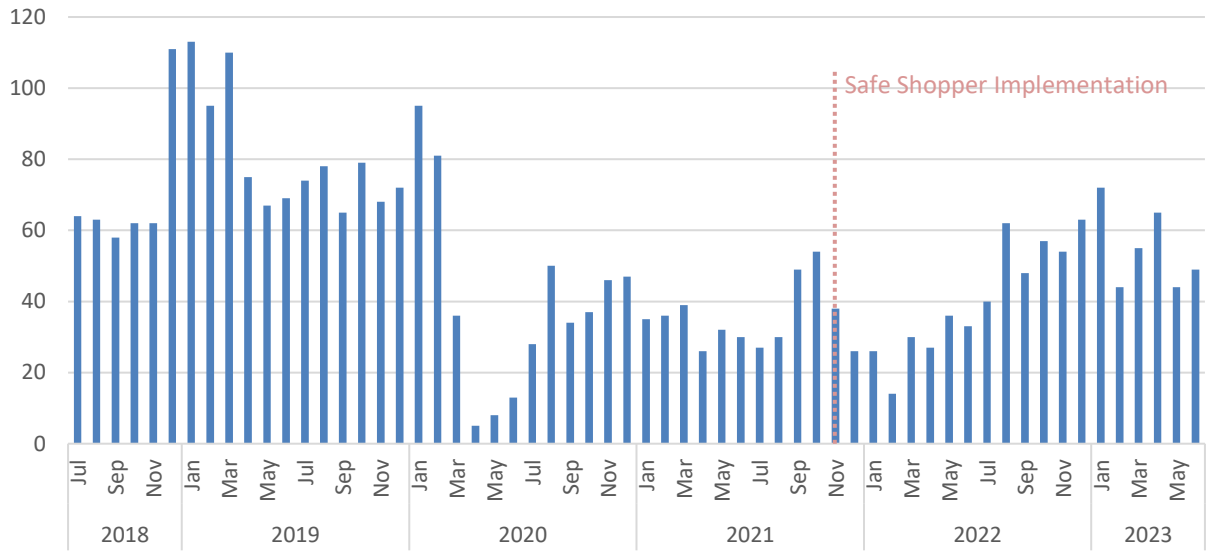
As one of the primary stated objectives of the Safe Shopper initiative is to deploy highly visible uniformed SFPD staff as a crime deterrent, we also assessed whether the frequency of incident reports within the footprint of Union Square differed between staggered deployment and all-hands deployment days.[6] To do so, we filtered for the 17 incident report codes related to robbery and shoplifting that are actively being monitored under SFPD's Organized Retail Theft program, funded by a State grant.[7] If the increased presence of uniformed SFPD staff deters crime, particularly theft, from occurring, we would expect to see a higher number of incident reports filed on days with all-hands deployment when fewer SFPD officers are patrolling Union Square. However, we did not observe this relationship in the data. In fact, retail theft-related incident

[6] Incident reports available on SF Open Data include reports filed by officers or self-reported incidents by members of the public using SFPD's online reporting system. Incident reports as provided by this dataset are not the official count of crime but do serve as the basis for official statistics reported to the FBI's Uniform Crime Reporting program.
[7] In September 2023, San Francisco was awarded an Organized Retail Theft (ORT) grant in the amount of $15.3 million from the California Board of State and Community Corrections. SFPD's grant, which was executed and began monitoring four months after the end of this report's audit period in October 2023, will use the funds to meet goals and objectives pertaining to the reduction of organized retail theft and motor vehicle theft.

reports were 12 percent more likely to be filed on a staggered deployment day, with higher Safe Shopper staffing, than on all-hands days with lower Safe Shopper staffing in Union Square.

Additionally, we analyzed retail-theft incident data in Union Square during the FY 2018-19 to FY 2022-23 audit period, as shown in Exhibit 4.3 below. This metric is one of the metrics that the state requires SFPD to monitor for its Organized Retail Theft grant program. Although a drop in incidents occurred for the holiday season immediately following the Safe Shopper implementation in November 2021, they have risen and in 2023 plateaued at a level higher than the period prior to implementation in 2021 but still lower than in 2018 and 2019. While it is possible that absent the Safe Shopper initiative, crime would have been higher in Union Square, it may also be the case that re-deploying officers to regular patrol duties to decrease 911 response times could have a similar impact on public safety.

Exhibit 4.3: Retail Theft-Related Police Incident Reports in Union Square, FY 2018-19 through FY 2022-23



Source: SF Open Data Incident Reports.
*Data includes only SFPD incident reports within the Union Square footprint.

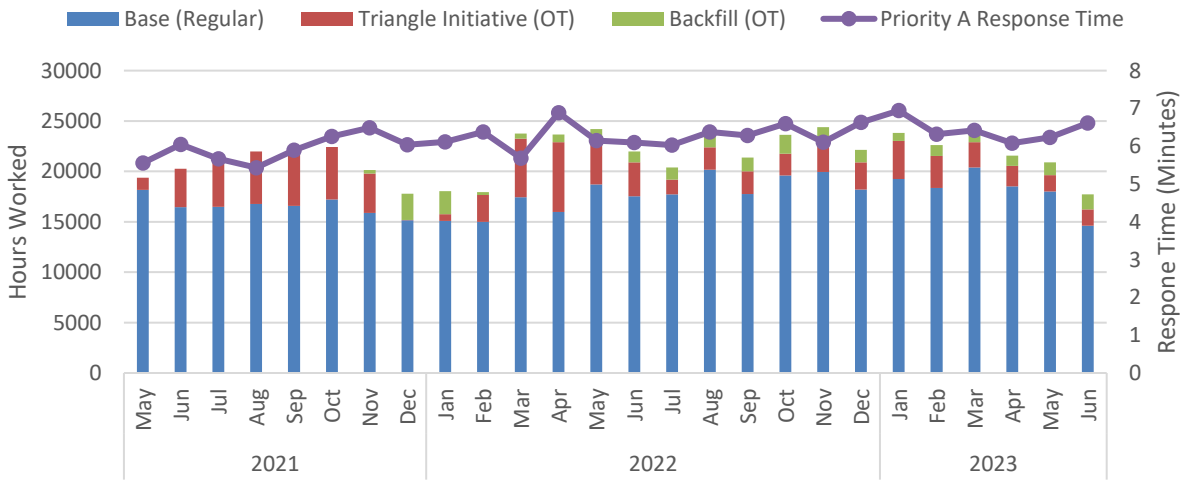
Quantifying outcomes is essential, and SFPD is not measuring the impact of Safe Shopper or other similar initiatives. For the SFPD to justify continued funding for these initiatives, they must be able to demonstrate clear results. The absence of routine monitoring of the cost effectiveness of overtime risks perpetuating a cycle of inefficient deployment of SFPD resources. Without clear benchmarks, the Department may continue to scale up these initiatives indefinitely, only adjusting if forced by external factors such as staffing constraints or competing priorities. We recommend that the SFPD adopt a more comprehensive internal evaluation process to assess

the Safe Shopper initiative's impact on public safety in order to guide resource allocations and provide justification for ongoing funding.

Tenderloin Triangle

The impact of overtime on public safety metrics observed within the Tenderloin district is inconclusive. Unlike Union Square Safe Shopper, it is more difficult to identify the public safety effects, if any, of the Tenderloin Triangle initiative because efforts are comingled with and cover the same footprint as backfill overtime and regular patrol time worked at Tenderloin station. As such, we are including SFPD hours worked for regular duty and patrol backfill in our observations. Taken all together, the hours worked under the Tenderloin Triangle Initiative do not correspond to faster response times to 911 calls originating from the Tenderloin Police district, as shown in Exhibit 4.4 below. Despite the thousands of hours in supplemental overtime hours per month, the median response time to Priority A 911 calls has grown relative to the months prior to implementation in May 2021.

Exhibit 4.4: Total Hours Worked Within Tenderloin Police District and Priority A Response Times, May 2021 through June 2023

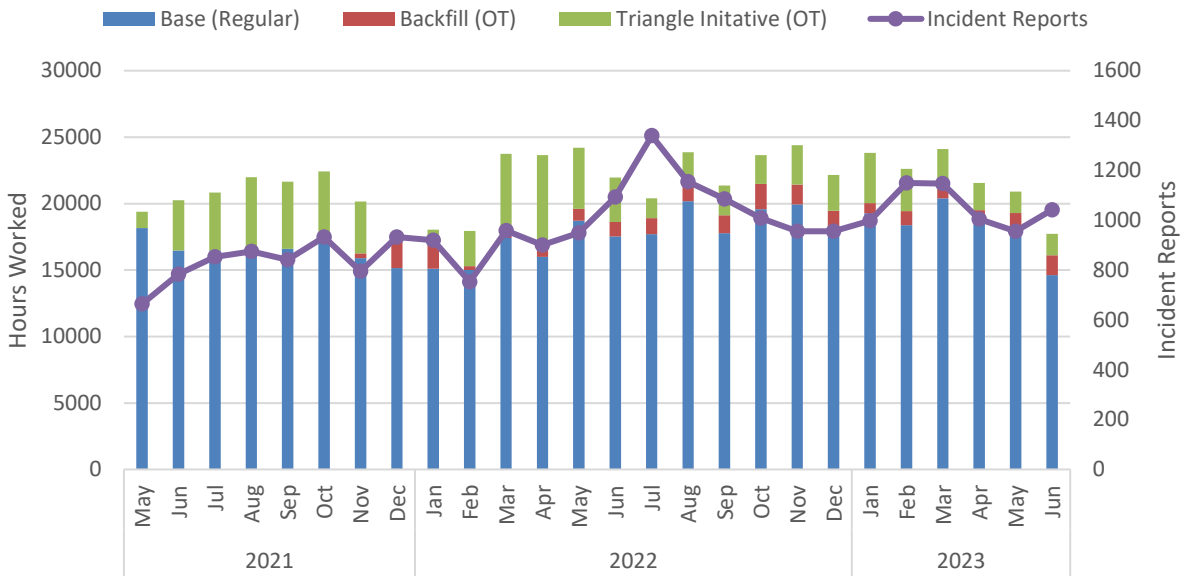


Source: SFPD Payroll Data, SF Open Gov 911 Calls for Service. We did not exclude self-initiated calls from this analysis due to the low number of self-initiated Priority A calls.
*The response target for Priority A calls for service is 8 minutes.

We also observed incident reports in the context of hours worked, as shown in Exhibit 4.5 below. From our analysis, we found that overall, there was no significant relationship between hours worked and incident reports filed and therefore we did not observe a deterrent effect from greater deployment. We also conducted this analysis excluding self-initiated calls and did not observe a significant relationship. Since May 2021 when the Tenderloin Triangle Initiative was

implemented, both hours worked at the Tenderloin Police District and incidents reported within the district have marginally grown.

Exhibit 4.5: Total Hours Worked in Tenderloin Police District and Incident Reports, May 2021 through June 2023



Source: SFPD Payroll Data, SF Open Gov Incident Reports

*Data above includes all types of initial incident reports filed in the Tenderloin District.

**Of the 25,000 incident reports filed in the Tenderloin District between May 2021 and June 2023, the most common incident categories reported were larceny theft (3,927), drug offense (3,860), assault (2,754), other miscellaneous (2,368), and non-criminal (1,962).

Because SFPD does not establish specific objectives or routine monitoring for the Tenderloin Triangle Initiative that are separate from regular duty for the Tenderloin station, and because they rely on voluntary shifts, Tenderloin Triangle initiative resources are not targeted towards need in any measurable capacity and are instead deployed based on SFPD staff availability. Poor correlation between SFPD hours worked and 911 response times to priority calls for service and incidents reported in the Tenderloin corroborate the need for a more substantial monitoring and deployment system of SFPD staff.

Tourism Deployment

Overtime hours worked under Tourism Deployment do not appropriately track by location. All Tourism overtime hours are logged under a singular event payroll code, even though tourism deployment occurs at multiple distinct areas of the City (such as Chinatown, Fisherman's Wharf, or Alamo Square). While there are descriptive comments associated with each shift worked, there is not a consistent practice of documenting which location was patrolled. It was therefore

impossible for us, or anyone, to evaluate public safety outcomes in areas and days with Tourism overtime deployment. We recommend that SFPD implement an indexing system for Tourism Deployment and other initiatives that correspond to frequent deployment sites so that they initiative may be properly monitored and evaluated.

SFPD Needs to Conduct a Cost-Effectiveness Analysis of Overtime Initiatives

Current SFPD overtime management does not include proper cost-effectiveness analysis of its overtime hours towards special initiatives, as recommended by the International Association of Chiefs of Police (IACP) Model Overtime Policy. As a result, the City has incurred significant overtime costs for these initiatives without a clear understanding of their impact in the context of their cost in overtime and officer resources. As shown in Exhibit 4.6 below, the total estimated cost of these three initiatives alone amounts to $30,824,783 over the course of the audit period.

Exhibit 4.6: Estimated Cost of Initiatives

	FY 2020-21	FY 2021-22	FY 2022-23	Total
Union Square Safe Shopper				
Hours	*n/a*	85,209	90,417	**175,626**
Est. Cost	*n/a*	$8,008,900	$9,388,766	**$17,397,666**
Tenderloin Triangle				
Hours	5,034	47,736	28,469	**81,239**
Est. Cost	$420,697	$4,198,920	$2,591,223	**$7,210,840**
Tourism Deployment				
Hours	*n/a*	34,762	28,318	**63,080**
Est. Cost	*n/a*	$3,318,277	$2,897,999	**$6,216,277**
Total				***$30,824,783***

Source: SFPD Overtime Data, San Francisco Salary Grades for FY 2020-21 through FY 2022-23.
*Costs estimated using mid-step overtime rates for each job code classification.

As discussed in the Introduction to this report, SFPD General Fund overtime hours increased by 189 percent between FY 2018-19 and FY 2022-23, and in FY 2022-23 SFPD required a $25.4 million supplemental General Reserve appropriation to cover overtime costs. Justifying the current expenditures attributed to special initiatives done on overtime is crucial, especially considering the growing departmental overtime budget and increasing Citywide response times to 911 calls and an increased strain to Departmental resources, as discussed later in this section. SFPD should establish a monitoring and cost-effectiveness analysis procedure for overtime tasks that consume a significant amount of SFPD resources. Where appropriate and feasible, the analysis should include public safety outcomes such as calls for service, crime rates, and successful prosecutions, along with qualitative factors, such as public feelings of safety. We also

recommend that SFPD modify the event code indexing system for Tourism Deployment and other special initiatives that correspond to frequent deployment geographic areas so that the initiatives may be properly monitored and evaluated.

A cost-effectiveness analysis and clear standards and criteria for allocating overtime hours to special initiatives could specifically help optimize the allocation of Full-Time Equivalents (FTEs) across initiatives. Currently, the Safe Shopper and Tourism Deployment initiatives are staffed with a disproportionate number of sergeants compared to Tenderloin Triangle, as shown in Exhibit 4.7 below.

Exhibit 4.7: Overtime Initiative Hours Worked by Job Classification, FY 2018-19 through FY 2022-23

Initiative	Job Code	Hours	Percent of Total
Union Square Safe Shopper	Police Officer I-III	108,797	61.9%
	Sergeant I-III	61,742	35.2%
	Lieutenant I-III	4,198	2.4%
	Total	*175,626*	
Tenderloin Triangle	Police Officer I-III	65,636	86.1%
	Sergeant I-III	8,655	11.4%
	Lieutenant I-III	943	1.2%
	Total	*81,239*	
Tourism Deployment	Police Officer I-III	39,091	62.0%
	Sergeant I-III	23,942	38.0%
	Lieutenant I-III	-	-
	Total	*63,080*	

Source: SFPD Payroll Data

*"Total" amounts shown above include a marginal amount (less than 500 hours) of overtime hours from additional job codes.

The proportion of sergeants' hours worked for the Safe Shopper and Tourism Deployment initiatives are more than three times that of the proportion of sergeants' hours worked under Tenderloin Triangle. Safe Shopper and Tourism Deployment rely primarily on the visible presence of SFPD staff for deterrence. The rank of sergeant does not enhance this effect, but it does increase costs.[8] These higher-ranking staff members could be more effectively deployed elsewhere in functions that require the rank of sergeant, such as sergeant patrol backfill. By using a cost-effectiveness approach, such as issuing budgetary caps instead of or in addition to allotted hours and improved strategic deployment standards, SFPD resources could be allocated

[8] If the Police Department had only used officers for special initiative hours worked by sergeants, the overtime savings would have been approximately $2 million between May 2021 through June 2023.

according to public safety needs and vital services provision rather than preferred staff assignments.

Overtime Initiatives are Disproportionately Straining SFPD Resources Across City

Beginning in 2021, SFPD has deployed significant police resources under these initiatives in designated high-profile areas using overtime. During this same time period, as police presence and resources in specific areas of the City increased to support these overtime initiatives, other areas of the City experienced reductions in police resources and services provision.

Exhibit 4.10: Sworn FTE Levels by Police District, FY 2018-19 through FY 2022-23

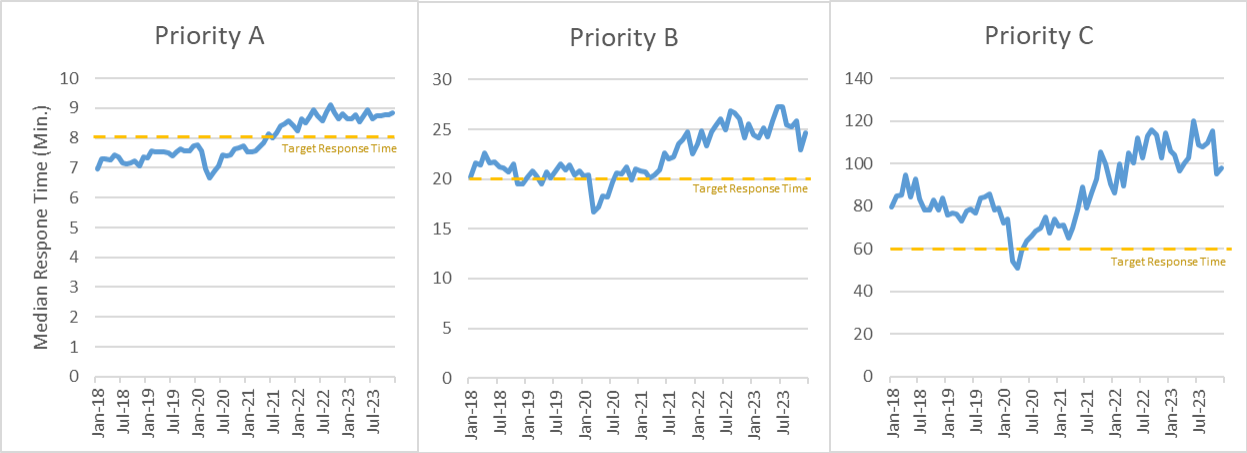
Station	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	5-year % Change
Central	149	157	143	141	119	-20.1%
Southern	145	148	142	129	115	-20.7%
Bayview	143	133	136	130	108	-24.5%
Mission	145	152	147	135	120	-17.2%
Northern	135	139	141	136	120	-11.1%
Park	92	86	85	81	68	-26.1%
Richmond	92	90	89	84	71	-22.8%
Ingleside	135	123	124	110	105	-22.2%
Taraval	105	103	102	97	77	-26.7%
Tenderloin	171	153	131	131	142	-17.0%
Total	**1312**	**1284**	**1240**	**1174**	**1045**	**-20.4%**

Source: SFPD

*FTE above includes all ranks of sworn officers.

As shown in Exhibit 4.10 above, sworn staffing levels at SFPD district stations have decreased by 20.4 percent from FY 2018-19 to FY 2022-23. Three stations in particular—Bayview, Park, and Taraval—have experienced shrinkage of approximately a quarter of their sworn FTEs. Supervising officers we interviewed identified these baseline staffing reductions as the greatest challenge they face as a station, and as discussed in *Section 1: Violations of Overtime Limits* of this report, many SFPD officers work overtime well in excess of established limits, which generates health and safety concerns as well as morale issues for the officers who remain. As discussed in *Section 3: Management of Backfill Overtime* of this report, one key consequence of staffing shrinkage has been a noticeable impact on the Department's ability to respond to calls for service in a timely manner as illustrated in Exhibit 4.11 below.

Exhibit 4.11: 911 Response Times, 2018 to 2023

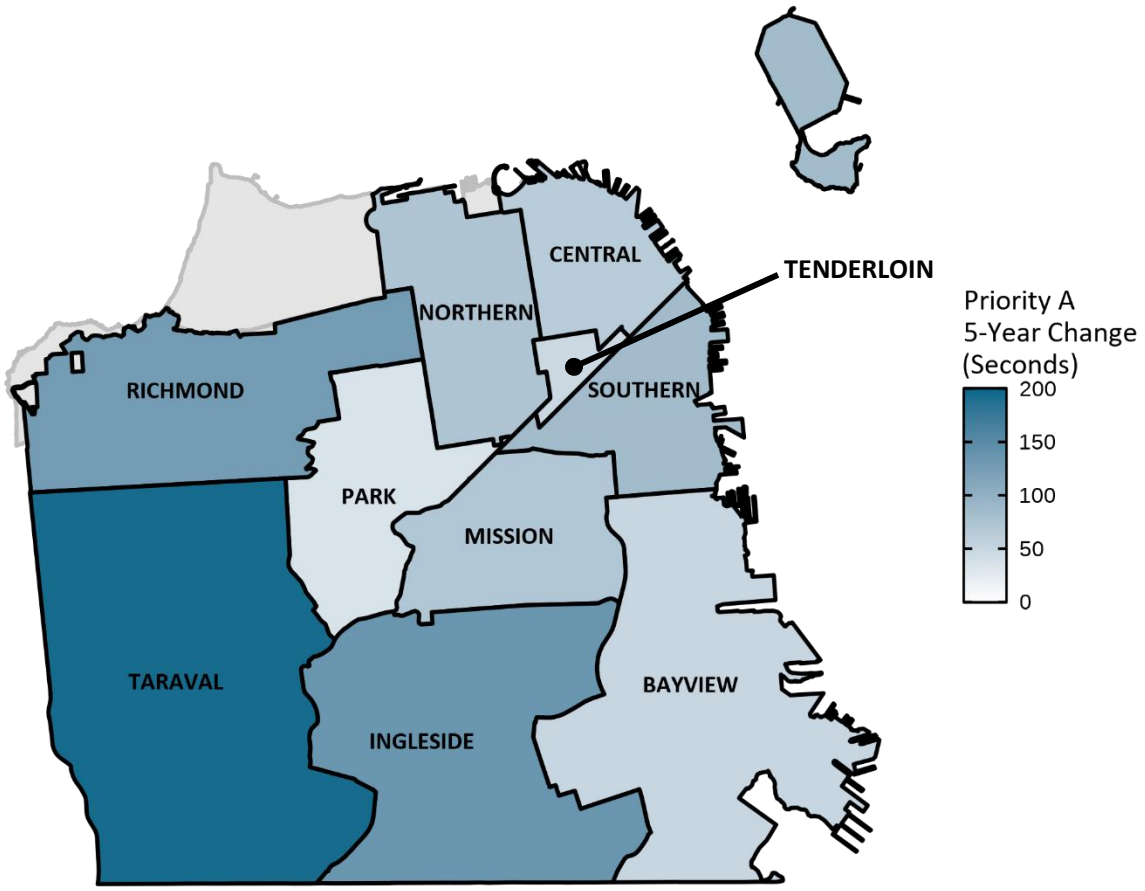


Source: San Francisco Public Safety Scorecard.

The hours allocated to staffing SFPD's special initiatives worked on overtime impose an additional burden on an already strained and disproportionately resourced Department. Exhibit 4.12 below shows each SFPD district's change in response times to Priority A calls for service over the course of the audit period between FY 2018-19 and FY 2022-23. Notably, Taraval station experienced the most significant increase, with response times to their most urgent calls for service rising by 258 seconds.[9]

[9] In addition to staffing levels, the geography and size of a police district may affect 911 response times and the impact of changes in staffing levels. For a large district like Taraval, a decrease in patrol staffing could have a more significant effect on response times because it takes longer to drive from one part of the district to another.

Exhibit 4.12: Change in SFPD response times to Priority A 911 Calls by SFPD District



FY 2022-23 Median Priority A Response Times (Minutes)

Central	Southern	Bayview	Mission	Northern	Park	Richmond	Ingleside	Taraval	Tenderloin
7.9	8.7	8.0	7.6	9.5	7.7	9.2	10.4	10.7	6.4

Source: BLA analysis of SF Open Data 911 Response Times

Although SFPD has deployed significant police resources in designated high-profile areas to carry out targeted initiatives staffed using overtime, the staffing levels at district stations have decreased and overall 911 response times have increased. We recommend that SFPD incorporate a review of special initiatives done on overtime into the biannual SFPD staffing analysis to determine whether baseline staffing levels for police districts should be adjusted due to routine overtime use.

Conclusion

SFPD does not adequately manage overtime hours worked towards special initiatives. There is a lack of clear, objective criteria and routine monitoring of overtime beyond officer availability and

district budgetary restrictions. As a result, sworn SFPD staff may not be deployed in a manner that materially improves public safety outcomes and that meets the standards established by the IACP to limit overtime and reserve its use for vital police functions. Furthermore, the lack of standards for cost-efficient deployment has led to a greater proportion of high-ranking officers than what is likely necessary to perform deterrence-based patrol functions. Given the significant increase in overtime hours and associated costs since FY 2018-19 and the overall, inequitable strain on SFPD resources Citywide to carry out these functions, it is important for SFPD to adopt management practices and monitoring standards that would lead to a more effective and efficient use of overtime hours.

Recommendations

The Chief of the San Francisco Police Department should:

4.1 Establish clear standards and criteria for allocating overtime hours to special initiatives.

4.2 Modify the event code indexing system for Tourism Deployment and other special initiatives that correspond to frequent deployment geographic areas so that the initiatives may be properly monitored and evaluated.

4.3 Establish a monitoring and cost-effectiveness analysis procedure for overtime tasks that consume a significant amount of SFPD resources. Where appropriate and feasible, the analysis should include public safety outcomes such as calls for service, crime rates, successful prosecutions, and/or qualitative factors such as public feelings of safety.

4.4 Incorporate a review of special initiatives done on overtime into the biannual SFPD staffing analysis to determine whether baseline staffing levels for police districts should be adjusted due to routine overtime use.

Benefits and Costs

Implementation of the proposed recommendations would decrease the risk of unnecessary overtime hours worked by the Department and generate associated budget savings associated with any reduction in overtime hours worked. Establishing monitoring standards and criteria for scale-down can be done using existing resources as a joint effort between the Overtime Compliance Unit and the SFPD Crime Strategies Division.

5. Overtime Policies, Procedures, and Management Best Practices

The overtime policies and practices of the San Francisco Police Department (SFPD) are not sufficient to limit unnecessary overtime and control potential abuse and are not fully compliant with best practices for overtime management. There is no central unit at SFPD responsible for ensuring that all SFPD overtime policies are enforced Department-wide, and overtime policy compliance is primarily handled by the commanding officers of each station or unit. Commanding officers have their own methods for monitoring overtime use under their jurisdiction, and much of this review occurs retroactively after the overtime has already been worked. Additionally, this review does not include whether the overtime hours are a justifiable use of overtime per SFPD policy. We also found through a review of a judgmental sample of 559 overtime cards that the Department-wide practice of obtaining two separate verifying and approving signatures for overtime worked was not consistently followed, which increases the risk for overtime fraud or abuse. Forty-eight out of 559 overtime cards reviewed were missing one or more required signatures, eight out of 559 cards had two of the same signatures, and 18 out of 559 cards had lieutenants or sergeants approving their own overtime.

This poor internal control environment increases the risk of overtime fraud or abuse, as well as the risk that not all of the overtime used by the Department is needed or justified. We recommend that SFPD increase oversight of overtime Department-wide by conducting regular audits of overtime hours worked, documenting pre-approval of overtime, and requiring captains to provide justification when they exceed their overtime budgets. SFPD should also evaluate the cost-effectiveness of overtime for specific tasks and functions and resume civilianization efforts to reduce overtime needs.

2018 BLA Audit Recommendations Were Not Implemented, Including Cost-Effectiveness Analysis

The Budget and Legislative Analyst's Office 2018 Performance Audit of the San Francisco Police Department (SFPD) included three recommendations on overtime internal controls: (1) to improve overtime policies related to shift extension and associated training, and to incorporate policy compliance into performance evaluations, (2) to revise biweekly overtime reports to identify high users and overtime violations, and (3) to incorporate cost-effectiveness of overtime and alternatives to overtime into decision-making.

SFPD partially implemented two of these recommendations. In 2021, SFPD updated its overtime policy to provide guidance on shift extension overtime. The biweekly overtime reports

sometimes, although not consistently, included information on overtime high users until 2022. However, as discussed in *Section 1: Violations of Overtime Limits and Excessive Use of Overtime* of this audit, the biweekly reports have not incorporated information on compliance with established overtime limits.

SFPD did not agree with the recommendation to incorporate overtime policy compliance into performance evaluations and has not implemented that recommendation. Based on discussions with SFPD management and additional audit fieldwork, we have recommended other strategies to enforce overtime policy compliance in this audit that the Department has agreed to implement. SFPD also did not implement the recommendation to do a cost-effectiveness analysis of overtime use, with which it agreed. A cost-effectiveness analysis is a recommended best practice for overtime management, as shown in Exhibit 5.1 later in this report section. Such an analysis could include, for example, evaluating the following considerations and options for a task or function that is currently performed using overtime hours: the level of staffing required for the task; whether civilians, Proposition F former police officers, or reserve officers could sufficiently perform the task; whether sworn staff on regular time could perform the task; whether sworn staff from other law enforcement agencies could perform the task; or not doing the task at all.

We continue to recommend that SFPD incorporate analysis of cost-effectiveness of overtime and alternatives to overtime use to accomplish tasks or program objectives into the annual budget. A cost-effectiveness analysis would allow SFPD to determine whether there are any tasks or functions that could be reduced or shifted from overtime to regular time for budget savings. It would also allow the Department to prioritize its resources and ensure that overtime hours are not being worked unnecessarily or for little benefit, and that the most effective functions are prioritized for overtime assignments. A cost-effectiveness analysis would benefit the Department in all aspects of its overtime use, as discussed in *Section 4: The Use of Overtime for Special Initiatives*.

Overtime Policies and Procedures Need Better Enforcement

SFPD's written overtime policies and procedures are missing key management elements identified in best practices, notably the International Association of Chiefs of Police (IACP) Model Overtime Policy. Additionally, our fieldwork testing and documentation review found that SFPD does not consistently enforce some of its overtime policies. Our fieldwork testing and documentation review included a review of SFPD's written overtime policies, interviews with eight station/unit captains to understand how overtime is managed and enforced in practice, and a review of a sample of overtime cards. Exhibit 5.1 below summarizes the main points of the IACP Model Overtime Policy, SFPD's main overtime policies, and whether these policies are enforced.

Exhibit 5.1: IACP Model Overtime Policy Compared to SFPD Overtime Policies

IACP Best Practice	SFPD Policy in Place	Enforced in Practice
IV.B.1 All overtime worked shall be approved for payment by the designated supervisor.	**Yes:** Overtime cards require signature and approval of commanding officer.	**Somewhat:** Our review of a judgmental sample of overtime cards for three of the highest using units of overtime revealed one or more commanding officer signatures were missing in 46 out of 159 SVU overtime cards (29 percent), one out of 200 Southern Station overtime cards (0.5 percent), and one out of 200 Mission Station overtime cards (0.5 percent). Additionally, there were 8 instances across the three units/stations (1.4 percent) where the same person signed for both signatures (two are required). Lastly, there were 18 instances out of the 559 reviewed overtime cards (three percent) where a lieutenant or sergeant approved their own overtime.
IV.B.2 The designated entity shall maintain overtime records and provide individual and summary data of overtime worked on a monthly basis to responsible agency supervisors and command personnel.	**Somewhat:** The SFPD Fiscal Division produces and distributes a biweekly overtime report, but there is no formal policy requiring it or detailing what it should contain, and there is no written documentation that the Fiscal Division is the entity designated to produce the reports.	**Somewhat:** SFPD did not consistently produce biweekly overtime reports during FY 2022-23 and those that were produced did not consistently show individual overtime data that would allow management to identify high users or violations of overtime limits.

IACP Best Practice	SFPD Policy in Place	Enforced in Practice
IV.B.3 Unit commanders and supervisors shall monitor individual and summary data reports of overtime expenditure to identify unusual, unexplained or disproportionate expenditures in overtime that may include but are not limited to the following: a) disproportionate use by an individual, b) significant and unexplained changes over time, c) higher costs compared to previously performed similar tasks, and d) expenditure of overtime at a rate that could exceed or negatively affect the budget.	**Somewhat:** The overtime policy states that commanding officers should review overtime and whether it is justified prior to authorization and retroactively. The policy directs commanding officers to make adjustments in future situations if needed, but does not explicitly mention any of the four instances called out in the IACP model policy.	**Somewhat:** Captains we interviewed each had their own unique method of reviewing overtime that varied based on their personal preferences. However, nearly all of these reviews were to ensure their stations were not exceeding their allotted overtime hours for the pay period, rather than for unexplained or disproportionate uses of overtime. Some captains used the biweekly overtime reports and others did not.
IV.C.1 No task or function shall be performed on overtime by agency personnel that could otherwise be performed during regular work hours.	**Yes:** The Department's overtime policy is to only use overtime "when necessary" and assess whether work can be accomplished during regular hours. The overtime policy includes guidelines for what overtime is necessary, which was added at the recommendation from the BLA 2018 audit.	**Somewhat:** In practice, most captains indicated that they believe all overtime is always necessary. Only one of the eight captains we spoke to said they evaluated whether the task done on overtime could have been accomplished on regular time.
IV.C.2 Supervisors shall establish and hold personnel responsible for a level of performance during standard work hours that minimizes the need for overtime and/or the need for additional personnel.	**Yes:** The Department has a policy to minimize overtime hours by investigating the necessity of overtime and taking measures to minimize it**.**	**Somewhat:** In practice, a few captains reported monitoring officers under their management for efficiency, but most said it would be up to lieutenants to monitor the officers.
IV.C.3 Only overtime required to meet vital service demands of the department shall be authorized.	**Yes:** The Department policy states that prior to authorizing overtime, it must be determined "whether the work performed on overtime is necessary to the mission of the Department."	**Somewhat:** Captains were divided on whether this is enforced because they were divided on whether there is any work done on overtime that could be done during regular work hours.
IV.C.4 All tasks and functions that require the use of overtime shall be routinely evaluated in terms of their cost-effectiveness.	**Yes:** The Department has a policy to review overtime use retrospectively.	**No:** In practice, cost-effectiveness analysis is not being done.

IACP Best Practice	SFPD Policy in Place	Enforced in Practice
IV.C.5 All overtime must receive advance authorization unless reasonable due to emergency circumstances.	**Yes:** The Department has a policy that overtime must be authorized in advance. However, the policy allows for verbal approval, which makes monitoring and tracking advance approvals nearly impossible.	**Yes:** Station captains reported that all overtime is approved in advance. For unexpected or emergency circumstances, this approval is almost always verbal.
IV.C.6 Reduce overtime by: a) Assign non-emergency service requests received near shift change to on-coming shift personnel; b) Use reserve officers/employees and volunteers where to offset temporary personnel shortages/vacancies and meet specialized needs; c) Anticipate and manage workload requirements where reasonable to best utilize standard duty hours; d) Manage leave use; among other items.	**Somewhat:** The Department's overtime policy includes a directive to commanding officers to evaluate whether a task can be completed on regular time. However, the overtime policy notably excludes the use of reserve officers and other alternative staff, and the Department did not complete any civilianization during the audit scope period. The Department has sick leave management policies, as discussed in *Section 2: Management of Sick and Injury-Related Leave* of this report.	**Somewhat:** In practice, commanding officers manage overtime inconsistently across stations and units. As noted in other sections of this report, the Department does not have a comprehensive staffing model to manage backfill overtime and does not manage sick leave effectively.

Source: IACP (best practices); SFPD (policies); BLA fieldwork (enforcement).

Exhibit 5.1 shows that, of the nine main IACP Model Policy components, SFPD is missing components of three written policies and procedures and lacking sufficient enforcement for eight. Many of these policies relate to what constitutes "necessary overtime" and how the Department directs commanding officers to reduce or limit overtime. The following sections outline the gaps in SFPD's overtime policy enforcement as compared to the IACP's best practice recommendations.

Existing Requirements and Practices for Overtime Monitoring are Insufficient to Limit Unnecessary Overtime

SFPD's practices for monitoring overtime use are not sufficient to control for potential overtime fraud or abuse. There is no central unit at SFPD responsible for reviewing overtime hours Department-wide and determining whether overtime hours worked were justified. As summarized in Exhibit 5.1, the IACP recommends that a police department have several policies to prevent the use of unnecessary and unjustified overtime, including policies that (a) prohibit the use of overtime for tasks that could be done during regular work hours (Policy IV.C.1); (b) prohibit the use of overtime for tasks that are not vital to the department's mission (Policy IV.C.3); and (c) require taking supervisory efforts to reduce the amount of overtime worked by shifting non-emergency assignments or using civilians, reserves, or other types of officers (Policy IV.C.6). These policies should be enforceable.

SFPD has some written policies prohibiting the use of overtime for tasks that are unjustified, including a policy prohibiting overtime for tasks not vital to the Department's mission and a policy directing supervisors to "consider" factors such as reassigning non-emergency work when approving overtime in the moment. However, there is no unit higher than the station/unit captain level responsible for enforcing any of these overtime best practices at SFPD. Furthermore, there is no entity responsible for (a) regularly reviewing and/or auditing overtime worked to ensure it was all justifiable, or (b) taking steps to reduce any unnecessary overtime in the future. The Overtime Compliance Unit, which is located in the Field Operations Bureau and monitors minimum staffing levels and overtime use at SFPD district stations, does not review overtime for justifiability (for example, overtime that could be done during regular work hours, is for a task that is not vital to the Department's mission, or for a task that could be done by another staff person). The Overtime Compliance Unit also does not monitor overtime use outside of Field Operations Bureau (such as overtime worked in Special Operations or Investigations).

In practice, station/unit captains are responsible for ensuring that nobody under their command is working overtime that is unjustified. However, there is no unit higher than the station/unit captain level responsible for enforcing this overtime monitoring, which is especially important because captains each have their own individual methods of reviewing overtime that varies

based on their personal preferences. Some captains use the biweekly overtime reports while others use other internal tracking methods that are unique to their unit/station. Captains also vary in what they would consider to be justified or necessary overtime. Furthermore, with the implementation of station-level biweekly pay period overtime allocations that began in September 2023, currently the captains' focus of their overtime review is to ensure that their stations/units do not exceed their allotted overtime hours for each biweekly pay period, similar to the review done by the Overtime Compliance Unit, rather than reviewing overtime to ensure that all overtime is justified and appropriate according to SFPD's overtime policies.

To address these gaps, we recommend that SFPD management require station captains, if they exceeded their biweekly overtime budgets, to justify the circumstances that required exceeding their budget. We also recommend that the Overtime Compliance Unit enforce the captains' review of overtime at their stations/units, including checking to ensure that all overtime is justified per SFPD policy. The Overtime Compliance Unit should also expand its scope to include all overtime worked at SFPD, not just within Field Operations Bureau. Overtime review should include the following parameters:

1. Individual and station-level overtime limits;
2. High users of overtime at the department (IACP Policy IV.B.3.a);
3. Significant or unexplained changes in overtime use when compared to similar periods of time (IACP Policy IV.B.3.b);
4. Negative impacts on unit or department budget (IACP Policy IV.B.3.d);
5. Assessment of arrest, investigation, and court time overtime to ensure it was justified; and
6. Assessment of special event overtime to ensure they were staffed appropriately.

Overtime Cards Missing Signatures

Our review of a judgmental sample of overtime cards revealed inconsistencies in the signatures that are required to approve and verify overtime worked by employees. Per SFPD's overtime policy, employees who work overtime must record the overtime hours worked using paper overtime cards that are certified by the employee's supervisor via signature on the back and approved by the commanding officer on the front. This policy aligns with the IACP's best practice, which states that all overtime should be approved for payment by the designated supervisor.

We sampled overtime cards for a selected pay period for three units/stations to assess how consistently these overtime card policies are followed. We selected the pay period ending March 21, 2023 for the Special Victims Unit (SVU), Mission Station, and Southern Station because they had high volumes of arrest- and investigation-related overtime in FY 2022-23. We reviewed all

the SVU cards (159) and the first 200 cards for Mission Station and Southern Station. Our review found:

- One or more commanding officer signatures were missing on:
  - 46 out of 159 SVU overtime cards (29 percent),
  - One out of 200 Mission Station overtime cards (0.5 percent), and
  - One out of 200 Southern Station overtime cards (0.5 percent).
- There were eight instances across the three units/stations (1.4 percent) where the same SFPD employee signed for both the supervisor and commanding officer signature.
- There were 18 instances out of the total 559 reviewed overtime cards (3 percent) where a lieutenant or sergeant approved their own overtime.

The required signatures on the overtime cards are an important control to ensure that the overtime reported by employees was actually worked and that it was reasonable and justifiable. Allowing overtime cards to be approved, processed, and paid out without the two separate signatures increases the chances that overtime could be misused or abused, and all overtime cards should have the required two separate signatures before they are processed.

Biweekly Overtime Reports Provide Insufficient Information

The biweekly overtime reports provided by the Fiscal Division of SFPD are not an effective useful tool for captains or commanding officers to manage overtime. The IACP Model Policy on overtime includes having a designated entity maintain overtime records and provide individual and summary data of overtime worked on at least a monthly basis. However, the reports that the Fiscal Division provides were not consistently issued during our audit period, did not contain sufficient information to manage overtime, and are not consistently used across the Department, making them less effective.

As noted in *Section 1: Violations of Overtime Limits and Excessive Use of Overtime* of this report, SFPD did not consistently produce biweekly overtime reports during FY 2022-23. Additionally, SFPD has not formalized what information the biweekly reports should contain. Requiring that certain information be consistently included in the biweekly reports would increase their effectiveness and ensure that important statistics, such as information on individual high users of overtime or violations of overtime limits, are not omitted or removed from the reports.

Verbal Approval for Overtime is Impossible to Track or Monitor

SFPD follows the IACP Model Policy's best practice and requires that all overtime hours be authorized in advance except under certain emergency circumstances. However, the Department's policy allows for verbal approval with no written documentation of such approval aside from the signed overtime card. The lack of documentation makes monitoring, tracking, and

analyzing advanced overtime authorizations nearly impossible and weakens the enforceability and effectiveness of the policy.

Our survey interviews of eight unit and station captains revealed that, in practice, overtime is always approved in advance, but each captain handles approvals and tracking approvals differently. For scheduled overtime hours, which include both mandatory and voluntary special events as well as 10B overtime, some captains use centralized sign-up sheets or whiteboards to identify employees to work those shifts, but not all captains use the same signup system. Captains who utilize this form of approval for scheduled overtime are creating written documentation of the overtime shifts that employees sign up for, but this written documentation is not required by the Department and therefore not all captains necessarily do it for every single overtime shift.

For overtime that is not scheduled in advance, such as arrest- and investigation-related overtime or overtime arising from other circumstances, station captains reported that this overtime is authorized verbally when the employee who needs to work the unexpected overtime at the end of their shift notifies their supervising officer, usually a lieutenant, about the situation and lets them know that they will be working overtime. The supervisor is then supposed to monitor the employee throughout the duration of the overtime worked to ensure that the work is being completed as expediently as possible and, at the end of the overtime shift, the supervisor signs off on the overtime card to demonstrate that the overtime was worked.

The lack of any form of written documentation of pre-approval for arrest, investigation, and other unscheduled overtime increases the risk that overtime shifts could be abused by employees or supervisors because it is impossible to track whether the appropriate approvals were secured before the overtime was worked. Enacting a Department-wide policy that overtime approvals must be documented in writing, for all types of overtime shifts including unscheduled mandatory overtime, would decrease that risk and improve the Department's internal overtime controls. The Department could add a box to the overtime cards that approving supervisors must check to indicate that the overtime worked was pre-approved; or, the Department could require that the approving supervisor send a timestamped email to document in writing that the overtime was approved.

Civilianization Plan Has Not Been Implemented

SFPD has not fully implemented its plan to improve and maximize its civilianization.[1] In May 2019, the Controller's Office issued a report on SFPD's progress towards better civilianization. The report included a list of 50 positions that SFPD identified as candidates for civilianization. SFPD's

[1] Civilianization is the process of using civilian positions to perform non-law enforcement duties instead of sworn staff. It is a recognized best practice for improving efficiency for law enforcement agencies.

2021 and 2023 staffing analyses also identified multiple opportunities for civilianization. Both the 2021 and 2023 staffing analyses quantified the gap between the number of recommended civilian positions and the number that SFPD had at the time of the reports across all bureaus. In 2021, SFPD needed 133 civilian positions out of a total 554 recommended ones, and in 2023 SFPD needed 233 out of a recommended 653. However, these civilian positions include bureaus where additional civilian (or non-sworn) staff are needed to augment current non-sworn staff as well as bureaus where non-sworn staff could be completing tasks currently carried out by sworn officers, so not all of these recommended non-sworn positions are the result of civilianization.

The staffing analyses do not quantify the number of positions that could be civilianized from current sworn positions, but they do identify specific job functions, tasks, and divisions that would benefit from civilianization. The tasks these potential civilian staff positions could do, which are currently done by sworn officers, include district station social media management, newsletter authoring, permit management, community engagement program planning, and non-urgent report writing. There are also opportunities to civilianize aspects of patrol and investigations work that could free up time of existing officers and make them more productive. As noted in SFPD's 2023 staffing analysis, civilianization would align SFPD with citywide goals of achieving salary savings, moving sworn officers away from administrative functions and back to patrol, and managing the Department in an effective and sustainable way. Additional specific roles that are mentioned in the 2023 staffing analysis for non-sworn staffing include:

- Field Operations Bureau:
    - Alcohol Liaison Unit and Permits: many administrative processes could benefit from non-sworn staff trained in operations
    - Captain's Staff: office operations, reporting, and newsletters could be civilianized;
    - Report Writing Unit: non-sworn staff could replace sworn members on temporary modified duty
    - Crime Services Division: needs an analyst position
- Investigations Bureau:
    - Crime Scene Investigations: could be civilianized
    - Forensic Services Division: fingerprinting and chemical analysis could be moved to non-sworn staff
- Special Operations Bureau:
    - Department Operations Center: SFPD needs to conduct further analysis on civilianization but according to the 2023 staffing analysis, much of this work does not require law enforcement expertise
- Administration Bureau:
    - Records Management: could be entirely civilianized

- Strategic Management Bureau:
    - Fiscal and Technology Divisions: both need additional professional staff
- Office of the Chief of Staff:
    - Risk Management, Labor Relations, and Media Relations: need additional professional staff

However, in August 2024 SFPD staff confirmed that all plans to move forward with civilianization stopped following the start of the COVID-19 pandemic and have not resumed. SFPD was unable to share details on any positions that have been civilianized since FY 2019-20. SFPD, the Mayor's Office, and the Board of Supervisors should resume civilianization efforts. Many of the job duties currently handled by sworn officers could be handled by civilian staff, which would free up sworn staff to conduct law enforcement duties and as a result reduce the need for overtime to perform those duties. When the Police Department requests a supplemental appropriation for overtime expenditures, as required in Administrative Code Section 3.17, we recommend that it provide an update on its implementation of overtime controls and civilianization as part of the supplemental appropriation request.

Importance of Overtime Monitoring

Without centralized, *enforceable* policies on all aspects of overtime use, the Department does not have sufficient controls in place to ensure overtime is not being abused or wasted. The United States Government Accountability Office (GAO) issues guidance on effective internal controls in its Standards for Internal Control in the Federal Government (the "Green Book"). The GAO standards emphasize the responsibility of management to maintain the quality of the controls. The GAO standards state that management should maintain the controls by continuously monitoring the internal controls, clearly delegating responsibilities to appropriate parties, and holding responsible individuals accountable for their part in maintaining controls. Centralized, enforced overtime policies that Department leaders utilize and communicate frequently to unit/station leaders would better meet higher internal control standards and would help commanding officers manage overtime at the unit/station level better. SFPD's overtime should be centrally managed and monitored to ensure the quality of control of the overtime can be maintained and the overtime policies and practices can be executed consistently across the Department. As recommended earlier in this report section, the central unit in charge of management (for example, the Overtime Compliance Unit) should review for individual compliance with daily and biweekly overtime maximums as well as review for whether the uses of overtime across stations and units are justified or if the work performed on overtime could be shifted to regular hours.

Conclusion

SFPD's overtime policies and practices are not sufficient to limit unnecessary overtime and control potential abuse, and SFPD is not adequately enforcing its overtime internal control policies. Some of the Department's overtime policies could be improved to better meet the standards established by the IACP. No single unit or entity is responsible for reviewing overtime hours and justifiability at the Department, and the Overtime Compliance Unit is not currently monitoring that all overtime hours used are used appropriately per SFPD policy. As a result, overtime monitoring is decentralized, with each captain having their own method for monitoring the amount of hours of overtime used and approved at their unit/station, and they also have their own methods for evaluating overtime appropriateness and justifications. This poor internal control environment increases the risk of overtime fraud or abuse, as well as the risk that not all of the overtime used by the Department is needed or justified. Better Department-wide overtime policies, and stronger enforcement of those policies, would lead to more effective and efficient use of overtime hours.

Recommendations

The Chief of the San Francisco Police Department should:

5.1 Direct the Overtime Compliance Unit to increase oversight of overtime Department-wide and by Police district by conducting regular audits of overtime hours worked and reviewing whether they are justified according to SFPD policy, including review of the following:

- Individual and station-level overtime limits;
- High users of overtime at the department;
- Significant or unexplained changes in overtime use when compared to similar periods of time;
- Negative impacts on unit or department budget;
- Assessment of arrest, investigation, and court time overtime to ensure it was justified; and
- Assessment of special events to ensure they were staffed appropriately.

5.2 Require approving supervisors to document, in writing, their pre-approval of all overtime hours. This documentation could include modifying the overtime card to add a pre-approval box and the signature of the approving supervisor, or requiring the approving supervisor to send a timestamped email to document in writing that the overtime was approved.

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

5.4 When the Police Department requests a supplemental appropriation for overtime expenditures, as required in Administrative Code Section 3.17, provide an update on its implementation of overtime controls and civilianization as part of the supplemental appropriation request.

5.5 Require station captains, if they exceeded their biweekly overtime budgets, to justify the circumstances that required exceeding their budget.

Benefits and Costs

Implementation of the proposed recommendations would decrease the risk of overtime fraud and abuse in the Department. The proposed recommendations would also reduce the use of unnecessary overtime in the Department and potentially generate budget savings by reducing unnecessary overtime costs. These recommendations would expand the responsibilities of the Overtime Compliance Unit and could require additional staff time to carry out additional overtime monitoring and auditing. If additional staff time is required, the Department should use civilian staff, rather than sworn, for these additional tasks.

Appendix A: Staffing Calculation Worksheets

The following pages contain worksheets prepared in the *Staffing Analysis Workbook for Jails, 2nd Edition*, issued by the U.S. Department of Justice National Institute of Corrections, that can be used to calculate SFPD's need for patrol coverage and the basis for a backfill overtime budget. Jails use "fixed post" staffing models that require a constant level of minimum staffing and operate 24/7, similar to SFPD's patrol minimum staffing levels. Like SFPD patrol, jails are also high-risk settings, have fluctuating workloads, and require relief or backfill staffing when regularly-scheduled employees are absent.

FORM A: Net Annual Work Hours

Steps	Job Classification: Classification 1	Classification 2	Classification 3	Classification 4	Classification 5
1. Total hours contracted per employee per year (if a regular workweek is 40 hours, then 40 (52.14 weeks = 2,086)					
2. Average number of vacation hours per employee per year					
3. Average number of compensatory hours off per employee per year					
4. Average number of sick leave hours off per employee per year					
5. Average number of training hours off per employee per year					
6. Average number of personal hours off per employee per year					
7. Average number of military hours off per employee per year					
8. Average number of break hours off per employee year (Optional; it may be a contractual item.)					
9. Other: [Specify.]					
10. Other: [Specify.]					
11. Other: [Specify.]					
12. Other: [Specify.]					
13. Total hours off per employee per year [total lines 2 though 12]					
14. Net annual work hours [subtract line 13 from line 1]					

FORM B: Facility Activity Schedule

Activity	Times	100	200	300	400	500	600	700	800	900	1000	1100	1200	1300	1400	1500	1600	1700	1800	1900	2000	2100	2200	2300	2400
1.																									
2.																									
3.																									
4.																									
5.																									
6.																									
7.																									
8.																									
9.																									
10.																									
11.																									
12.																									
13.																									
14.																									
15.																									
16.																									
17.																									
18.																									
19.																									

FORM C: Staff Coverage Plan

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
Post/Position	Job Class	Meal Relief?	Total Hours on Days	Total Hours on Nights	Total Hours on Graves	12-hr. Day	12-hr. Night	Other hours	Other hours	No. of Days per Week	No. of Hours per Week	No. of Hours of Coverage per Year	Is Relief Needed for This Post?	Net Annual Work Hours	Total No. of FTEs Needed	Rounded No. of FTEs
CLASSIFICATION 1																
CLASSIFICATION 2																
Subtotal Classification 2																
CLASSIFICATION 3																
Subtotal Classification 3																
CLASSIFICATION 4																
Subtotal Classification 4																
CLASSIFICATION 5																
Subtotal Classification 5																
TOTAL STAFF																

FTE = Full-time equivalent staff

FORM D: Staff Summary Sheet

A	B	C	D
Job Classification	Annual Number of Coverage Hours (Form C, Column M)	Total FTE Staff Needed, as Calculated (Form C, Column P)	Total FTE Staff Needed, Rounded (Form C, Column Q)
CLASSIFICATION 1			
CLASSIFICATION 2			
CLASSIFICATION 3			
CLASSIFICATION 4			
CLASSIFICATION 5			
TOTAL			

FTE = Full-time equivalent staff

Appendix D. Converting Net Annual Work Hours to a Relief Factor

Length of Shift	X	Number of Shifts/Day	X	Number of Days/Week	X	52.14 (wks/yr)	÷	NAWH	=	SRF

Example 1

1. 8-hour shift	
2. 3 shifts/day	8 x 3 = 24
3. 7 days/week	24 x 7 = 168
4. 52.14 weeks/year times total hours/week	168 x 52.14 = 8,760
5. Total annual hours divided by NAWH (NAWH is 1,600 for this job classification)	8,760 ÷ 1,600 = **5.475**

In other words, it takes 5.475 full-time equivalents (FTEs) to staff this post. This might be a typical calculation for a control-center post.

Example 2

1. 10-hour shift	
2. 1 shift/day	10 x 1 = 10
3. 5 days/week	10 x 5 = 50
4. 52.14 weeks/year times total hours/week	50 x 52.14 = 2,607
5. Total annual hours divided by NAWH (NAWH is 1,680 for this job classification)	2,607 ÷ 1,680 = **1.55**

In other words, it takes 1.55 FTEs to staff this post. This might be a typical calculation for a classification post.

1. Identify the number of hours in the basic shift for which you want a relief factor (e.g., 8).

2. Multiply this by the number of shifts per day (this equals total hours per day).

3. Multiply this by the number of days per week that the post needs coverage (this equals total hours per week).

4. Multiply this by the 52.14 weeks in a year (this is the total hours per year).

5. Divide this by the net annual work hours (NAWH) to produce a shift relief factor (SRF).

CITY AND COUNTY OF SAN FRANCISCO
POLICE DEPARTMENT
HEADQUARTERS
1245 3RD Street
San Francisco, California 94158

LONDON N. BREED
MAYOR

WILLIAM SCOTT
CHIEF OF POLICE

December 10, 2024

Linden Bairey
Budget and Legislative Analyst's Office
San Francisco Board of Supervisors
San Francisco, CA 94103

Dear Ms. Bairey,

Re: SFPD OT Audit Response

Thank you for the continuing to assist the San Francisco Police Department (SFPD) in improving our systems related to the use and administration of overtime in the SFPD.

As noted in the audit, the increase in the use of overtime in the SFPD is directly tied to the current understaffing of the Department, which at last count was noted at a shortfall of at least 274 officers. Prior to 2020, SFPD had not required officers to backfill shifts on overtime when other members were absent because the Department had enough personnel to cover the work using on duty personnel. As staffing levels have dropped, overtime has increased at an inversely proportional rate.

Seeing the climbing overtime costs, SFPD recognized the need to improve controls and, while you were conducting, or had completed, your fieldwork, made some of the adjustments recommended by your audit. SFPD has improved its day-to-day management of overtime by establishing an Overtime Compliance Unit and deploying a dashboard to help identify stations that are not adhering to policies or exceeding their overtime allocations. And, since there is more to be done to ensure that overtime is used appropriately and in the right quantities, SFPD appreciates the recommendations you have made to help us in that endeavor.

SFPD's reasons for partial agreement and disagreement are provided below and on the attached table, which is a slightly more detailed document. Of the 29 recommendations, SFPD agrees with 12, partially agrees with 14, and disagrees with three.

<u>Areas of Partial Agreement</u>
Fourteen recommendations: 1.3, 1.5, 2.2, 2.4, 2.6, 2.8, 3.3, 3.5, 3.6, 4.3, 5.1, 5.2, 5.3, and 5.4

The SFPD partially agrees with 1.3, 3.3, and 5.1 as the Overtime Compliance Unit (OCU) conducts routine monitoring of OT expenditures bi-weekly. Justification of OT is best validated by the commanding officer or platoon commander who is requesting/approving the overtime. Captains discuss the justifications for exceeding allocations with their Commanders. SFPD will review options for extending additional levels of review of the justifications for the use of overtime.

The SFPD partially agrees with recommendation 1.5. Instead of Captains pre-scheduling backfill, that responsibility falls to the platoon commander (Lt.). SFPD will work to develop a process to pre-schedule backfill when possible. However, absences that result in a need for backfill are often unplanned leaves, such as sick leave or intermittent FMLA. Discretionary leaves are generally not granted if the leave will take the station below minimum staffing.

SFPD partially agrees with recommendation 2.2 to adhere to the provisions of the Memorandum of Understanding with the POA related to reviewing sick leave usage to determine eligibility to work 10B shifts. However, this provision in the MOU is impacted by current staffing shortages. SFPD will be recommending to DHR that negotiations on this provision occur as soon as possible to amend the MOU to reflect current staffing realities and scheduling difficulties. Realignment to a more realistic threshold may be necessary.

The SFPD partially agrees with recommendation 2.4 and has developed SP dashboard for use by supervisors and leadership, which represents "real-time" monitoring capability. However, with the limitations of HRMS, longer-term trends are more difficult to monitor. SFPD will evaluate the ability to expand the dashboard to include a longer timeframe for review to see seasonal, yearly, and other trends.

SFPD partially agrees with recommendation 2.6 to incorporate sick leave absences into employee performance evaluations. Focusing on sick leave policy compliance in performance evaluations is too narrow a topic to discuss. However, SFPD will consider emphasis on attendance more broadly, which is more appropriate to a holistic review of employee performance. Nevertheless, adherence to policies is a disciplinary matter and violations of SFPD policies are referred to internal affairs.

The SFPD partially agrees with recommendations 2.8 and 3.6 to negotiate with the SFPOA for various changes to current memoranda of understanding. The department will discuss these changes with the Department of Human Resources Employee Relations Division (ERD) and submit proposals during the collective bargaining process in 2026.

The SFPD partially agrees with recommendation 3. 5.. Currently, SFPD includes backfill overtime as a part of the total overtime budget. SFPD reviews the prior year actual OT spend and the conditions that created it. SFPD uses that as a baseline and applies any COLAs. Changes in staffing circumstances are reviewed to determine if the overtime budget should be adjusted. Other major types of overtime or driving factors are reviewed as well, and the overtime budget proposal is adjusted. The resulting budget projection is submitted to and discussed with the Mayor's Office.

SFPD partially agrees with recommendation 4.3 and 5.3 to perform a cost effectiveness analysis for policing strategies that demand heavy resources and incorporate that into budget requests. SFPD considers crime rates, community input, requests from public officials, public safety, and calls for service. SFPD does track and monitor some of these metrics for specific initiatives but does not formalize this into periodic, formal reports. Currently, SFPD does not have the

personnel to undertake the development & publication of formal reports. SFPD will explore opportunities to add a review of cost to the existing forums, or elsewhere, in which these considerations are discussed.

Aside from the note above for 5.1, SFPD partially agrees with this recommendation to review for violations of overtime policies. Some of these reviews are already being conducted by other Divisions/Units, some are being conducted by OCU, and others will be added. SFPD will have to determine the best unit to conduct the reviews, according to the scope of the unit itself.

SFPD partially agrees with recommendation 5.2. Overtime needs are fluid for every Bureau. OT decisions are based on sporadic incidents, staffing needs, or station priorities. However, since supervisors are aware that overtime is necessary and who will be working it, documenting that awareness is appropriate. SFPD will work to identify a method for, and implement, this documentation.

The SFPD partially agrees with recommendation 5.4, to provide updates on overtime controls and civilianization when requesting overtime supplemental appropriations. With the exception of one year of the last five, SFPD has not requested additional general funds in the form of a supplemental appropriation but rather a de-appropriation of salaries (realized from position vacancies) and re-appropriation to overtime. For a de-appropriation/re-appropriation request, providing updates regarding overtime controls are appropriate. However, because hiring civilians has little-to-no impact on sworn overtime costs and any improvements to the use of civilians is given consideration and discussed in the annual budget process, SFPD disagrees with updates on this topic at that time.

Areas of Disagreement
Three recommendations: 2.7, 3.7, and 4.4.

The SFPD disagrees with recommendation 2.7 to revise DGO 11.10. Members returning from long-term leave, such as those due to pregnancy or a work-related injury, can use the fitness award to ensure they are in the physical condition necessary to perform their job functions. In addition, the fitness award was conceived as an incentive for members to maintain health and wellness, and to ensure personnel are physically capable of performing the duties of a police officer. Removing this incentive for a person who has been out sick for more than 40 hours in a six-month period could easily lead to a "downward spiral" in health and wellness.

SFPD disagrees with recommendation 3.7 to implement a flexible watch system. Flexible watch assignments are likely to realize downstream negative impacts and further complicate scheduling, both of which together outweigh the benefit of such an approach. Specifically, this recommendation would likely result in additional compensation, possibly erasing any savings. In addition, sudden and/or frequent changes to members' shifts (i.e., waking and working hours), have been shown to impact the physical and mental health of those subjected to these shift changes. For SFPD members, it would disrupt caregiving plans, as well as impact the needs of the member, as well as his/her/their family, friends, and colleagues.

SFPD disagrees with recommendation 4.4 to review overtime during the preparation of the biannual staffing analysis to address the potential overuse of overtime at some stations and adjust the baseline staffing recommendation as a result. However, the staffing analysis methodology for District Stations is well-established, having benefitted from the input of the community, internal and external stakeholders, and police staffing experts. Further, routine overtime use is present in every district and to meet many other operational needs. This recommendation can be reconsidered when the Department approaches baseline staffing levels in which overtime use might signal a unique staffing need.

I appreciate the time and effort of you and your team in completing this audit and I look forward to further discussions at your earliest convenience.

Sincerely,

William Scott

WILLIAM SCOTT
Chief of Police

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
1.1 Consistently produce and distribute biweekly overtime reports with detailed information on individual and departmental overtime usage, including violations of established limits.	X			SFPD agrees with the recommendation. Since the BLA's fieldwork, SFPD has established new overtime monitoring and reporting practices. 16 and 70 hour violations are tracked per pay period. Violations are sent to members commanding officer to investigate. Station Captains are provided bi-weekly allotments, which are monitored to ensure stations are staying within their budgets. Department-wide OT spending is monitored by Fiscal every two weeks and the CFO and Exec Dir of Strategic Management review salaries spending and projections with the Assistant Chiefs and Chief every month and discuss whether adjustments to Stations and other allocations are necessary.	
1.2 Implement a Department-wide, daily overtime monitoring system or dashboard to provide current information for supervisors and enable them to proactively manage overtime usage to reduce violations of established overtime limits.	X			Since the BLA's fieldwork, SFPD has set up an OT dashboard, which provides OT information for the previous 24 hours, so supervisors can proactively manage overtime usage to help reduce overtime violations.	
1.3 Implement recommendation 5.1 to require the Overtime Compliance Unit to conduct regular audits of overtime hours worked and review whether they are justified according to SFPD policy.		X		SFPD partially agrees with the recommendation. The Compliance Unit currently monitors OT bi-weekly. Justification of OT is best validated at the Station of occurance by the commanding officer or platoon commander. Captains discuss the justifications for exceeding allocations with their Commanders. SFPD will review options for extending additonal levels of review of the justifications for the use of overtime.	
1.4 Enforce administrative consequences for supervisors who approve excessive overtime without proper justification and for staff who consistently violate overtime policies.	X			SFPD agrees with the recommendation. Since BLA's initial fieldwork, SFPD developed and published DN 24-142, which addresses administrative consequences.	
1.5 Develop a system that requires captains to pre-schedule backfill overtime for officers, sergeants, and lieutenants to the largest extent possible.		X		SFPD partially agrees with the recommendation. Scheduling responsibilities lie with the platoon commander (Lts). SFPD will work to develop a process to pre-schedule backfill when possible. However, absences that result in a need for backfill are often unplanned leaves, such as sick leave or intermittent FMLA. Discretionary leaves are generally not granted if the leave will take the station below minimum staffing.	

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
2.1 Enforce existing **sick leave policies to ensure that supervisors consistently monitor illness- and injury-related leave usage.** Supervisors should monitor employee attendance records for patterns that could indicate abuse and take corrective action where necessary.	X			SFPD agrees with the recommendation. Since the BLA's fieldwork, DN 24-050 has been released, addressing SP abuse and providing the procedures to address patterns that indicate potential abuse. SFPD has set up a dashboard that tracks SP for the previous PP to monitor sick leave usage that assists leaders in determining whether corrective action is appropriate.	
2.2 Adhere to the provisions of the Memorandum of Understanding with the Police Officers' Association by conducting quarterly reviews of sick leave usage to determine eligibility for 10B overtime assignments. Any employee exceeding the 20-hour threshold of sick leave in the prior three months should be deemed ineligible for 10B assignments.		**X**		SFPD agrees that it should be adhering to the provisions of the Memorandum of Understanding with the POA. However, this provision is impacted by current staffing shortages. SFPD will be recommending to DHR that negotiations on this provision occur as soon as possible to amend the MOU to reflect current staffing realities and scheduling difficulties. Realignment to a more realistic threshold may be necessary.	
2.3 Establish and regularly convene the Health and Safety Committee as required by the Memorandum of Understanding with the Police Officers' Association. This committee should review and update the Injury and Illness Prevention Program at least annually, or more frequently as necessary, to address emerging health and safety risks within the Department.	x			SFPD agrees with this recommendation. Since the BLA's fieldwork, SFPD has hired a professional member of the Department to ensure SFPD maintains an updated Injury and Illness prevention program and guidebook to ensure that SFPD adheres to Health and Safety requirements. The Health and Safety Committee has been established and its first meetings were held on May 2nd, 2024 and November 13th, 2024. The Committee will continue to meet semiannually.	
2.4 Develop a process for tracking and analyzing sick leave usage pattern that includes (a) real-time monitoring of leave and potential abuse, and (b) the generation of detailed reports that can be used to inform management decisions and ensure compliance with Departmental policies.		X		SFPD partially agrees with the recommendation. SFPD has developed an SP dashboard for use by supervisors and leadership, which represents the "real-time" monitoring capability. However, with the limitations of HRMS, trends are more difficult to monitor. SFPD will evaluate the ability to expand the dashboard to include a longer look-back and seasonal/yearly trends.	
2.5 Conduct regular internal audits of sick leave usage and management practices to ensure that policies are being followed and that any instances of non-compliance are sufficiently addressed. These audits should also assess the effectiveness of the corrective actions taken by supervisors.	X			SFPD agrees with the recommendation. The SP dashboard monitors members SP's. The dashboard is provided to commanding officers and platoon commanders that allows internal audits for sick leave usage patterns for the previous PP.	
2.6 Incorporate compliance with sick leave policies into performance evaluations of all sworn staff.		X		Performance Evaluations are not the place to include commentary on sick leave policy compliance specifically. SFPD will consider more emphasis on attendance more broadly, which is more appropriate to employee evaluations and is included in the performance evaluation. Adherence to policies is a disciplinary matter and violations of any policies are referred to internal affairs.	

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
2.7 Negotiate with the Police Officer's Association to revise Department General Order 11.10 to make employees who used more than 40 hours of paid sick leave the previous six months ineligible to earn "fitness award" time off.			x	SFPD disagrees with this recommendation. Members returning from long-term leaves, such as maternity or a leave due to work-related injury, require the fitness award to ensure they are in the physical condition necessary to perform their job functions. In addition, the fitness award was conceived as an incentive for members to maintain health and wellness, and to ensure personnel are physically capable of performing the duties of a police officer. Removing this incentive for a person who has been out sick for more than 40 hours could easily lead to a "downward spiral" in health and wellness.	
2.8 Negotiate with the Police Officers' Association to include a restriction on sworn employees' eligibility to earn holiday compensation when an employee calls out sick on the days preceding or following a holiday in the Memorandum of Understanding between the City and the Police Officers' Association.		X		The Department will consider submitting a proposal to DHR regarding this issue during the collective bargaining process in 2026. However, adjusting this provision for sick leave usage would leave police officers unaligned with other bargaining units in the City and County.	
3.1 Require all bureaus and units of the Operations Division to track and report patrol backfill and non-patrol backfill overtime separately, and require all backfill overtime hours to have a radio unit code associated with the time worked.	X			SFPD agrees with the recommendation. Since the BLA's fieldwork, SFPD has set up an OT dashboard, which tracks call signs, patrol backfill, and non-patrol backfill overtime separately.	
3.2 Establish minimum staffing guidelines to backfill non-patrol assignments.	X			As it pertains to non-Airport operations bureaus, since BLA conducted its fieldwork, the Special Operations Bureau has developed a minimum staffing model. The Investigations Bureau's backfill needs fluctuates daily among the investigative units based on crimes or events that occur. However, the Investigations Bureau has two functions that do require minimum staffing and for which the Bureau is developing their model.	
3.3 On an ongoing basis, direct the Overtime Compliance Unit to audit and review use of non- patrol backfill overtime to verify whether the use of backfill overtime was appropriate for that assignment dependent on Citywide staffing needs.		X		SFPD partially agrees with the recommendation. The Compliance Unit currently monitors OT bi-weekly. Justification of non-patrol backfill OT is best validated at the Station of occurrence by the commanding officer or platoon commander. Captains discuss the justifications for exceeding allocations with their Commanders. SFPD will review options for extending additional levels of review of the justifications for the use of overtime.	

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
3.4 Before future station watch sign-ups, identify stations that regularly exceeded or failed to meet minimum staffing levels during the previous six-month period and make reasonable attempts to adjust station and watch staffing levels ~~as~~ to improve patrol coverage.	X			SFPD agrees with the recommendation when staffing conditions allow. However, currently each stations is below minimum staffing levels. To return to a staffing level that required no backfill, patrol would need approximately 120 officers. Though SFPD is critically short in staffing levels, the Department reviews and adjusts, as possible, staffing levels on a regular basis as crime trends and community needs shift. These micro-adjustments occur more frequentluy than every six months.	
3.5 Annually prepare a detailed patrol staffing model, using actual and projected sworn staffing, time off, information from station watch assignments, and the Department's annual Staffing Analysis, to calculate the appropriate backfill overtime budget for each district station and the Department overall, and include this information in the Department's annual budget presentations to the Police Commission and the Board of Supervisors.		x		SFPD partially agrees with this recommendation. Currently, SFPD includes backfill overtime as a part of the total overtime budget. SFPD reviews the prior year actual OT spend and the conditions that created it. SFPD uses that as a baseline and and applies any COLAs. Changes in staffing circumstances are reviewed to determine if the overtime budget should be adjusted. Other major types of overtime or driving factors are reviewed as well, and the overtime budget proposal is adjusted. The resulting budget projection is submitted to and discussed with the Mayor's Office.	
3.6 Negotiate with the Police Officers' Association to limit sworn staff's ability to earn and use compensatory time off during six-month periods during which the Department uses overtime for patrol backfill.		X		The Department will discuss with DHR and consider submitting a proposal regarding this issue during the collective bargaining process in 2026.	

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
3.7 Implement a flexible watch assignment pilot program and negotiate with the Police Officers' Association to allow SFPD to flexibly adjust watch assignments and re-assign officers to shifts with higher staffing needs.			X	Flexible watch assignments are likely to realize downstream negative impacts and further complicate scheduling, both of which together outweigh the benefit of such an approach. Specifically, this recommendation would likely result in additional compensation, possibly erasing any savings. In addition, sudden and/or frequent changes to members' shifts (i.e., waking and working hours), has been shown to impact the physical and mental health of those subjected to shift changes. For SFPD members, it would disrupt caregiving plans, as well as impact the needs of the member, as well as his/her/their family, friends, and colleagues. This method may be possible for those circumstances in which platoon commanders can plan well ahead. However, backfill needs very frequently arise last minute, preventing the ability to plan ahead for this adjustment to a member's watch. To illustrate, assume a pilot program is in place for a day watch officer. The platoon commander of the stations receives notice of an officer's sick leave an hour before the start of his/her night shift. The day watch officer, now at home sleeping, if they were called in to take the shift, his/her next shift will likely require backfill. This would not result in any savings and and would simply disrupt routines. Planning the staffing schedules, shifts, and assignments of 1400 police personnel for 24-7, 365 days of operation is no small task and adding "special" circumstances or flexibility further complicates that planning. SFPD has experienced this with other City initiatives and has had to rescind it's engagement in those initiatives as staffing levels continued to fall.	
4.1 Establish clear standards and criteria for allocating overtime hours to special initiatives.	X			SFPD agrees with the recommendation. Clear standards and the criteria for allocating overtime hours for special initiatives are in place as well as the special initiative mission.	
4.2 Modify the event code indexing system for Tourism Deployment and other special initatives that correspond to frequent deployment geographic areas so that the initiative may be properly monitored and evaluated.	X			SFPD agrees with the recommendation. Event numbers are assigned for all overtime station priorities so that overtime is properly tracked for amount of hours used within a PP. To evaluate OT use and effectiveness, having a consistent and systematic approach to generating and using event codes will be critical.	

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
4.3 Establish a monitoring and cost- effectiveness analysis procedure for overtime tasks that consume a significant amount of SFPD resources. The public safety outcomes, such as calls for service, crime rates, successful prosecutions and/or qualitative factors such as public feelings of safety.		x		SFPD considers crime rates, community input, requests from public officials, public safety, and calls for service. SFPD does track and monitor these metrics for specific initiatives but does not formalize this into periodic, formal reports. Currently, SFPD does not have the personnel to undertake the development & publications of formal reports. SFPD will explore opportunities to add a review of cost to the existing forums, or elsewhere, in which these considerations are discussed.	
4.4 Incorporate a review of special initiatives done on overtime into the biannual SFPD staffing analysis to determine whether baseline staffing levels for police districts should be adjusted due to routine overtime use.			X	The staffing analysis methodology for District Stations is well-established, with community and stakeholder input to develop it. Further, routine overtime use is present in every district and to meet many other operational needs. This recommendation will be reconsidered when the Department approaches baseline staffing levels and overtime use might signal a staffing need.	
5.1 Direct the Overtime Compliance Unit to increase oversight of overtime Department-wide and by Police district by conducting regular audits of overtime hours worked and reviewing whether they are justified according to SFPD policy, including review of the following: · Individual and station-level overtime limits; · High users of overtime at the department; · Significant or unexplained changes in overtime use when compared to similar periods of time; · Negative impacts on unit or department budget; · Assessment of arrest, investigation, and court time overtime to ensure it was justified; and · Assessment of special events to ensure they were staffed appropriately.		X		SFPD agrees with this recommendation, but may assign this work to several units based on the scope of each area outlined in this reccomendation.	
5.2 Require approving supervisors to document, in writing, their pre-approval of all overtime hours. This documentation could include modifying the overtime card to add a pre-approval box and the signature of the approving supervisor, or requiring the approving supervisor to send a timestamped email to document in writing that the overtime was approved.		X		Overtime needs are fluid for every Bureau. OT decisions are based on sporadic incidents, staffing needs, or station priorities. However, since supervisors are aware that the overtime is necessary, documenting that awareness is appropriate and SFPD will work to identify a method for, and implement, this documentation.	

Recommendation	Agree	Partial Agree	Disagree	Response to the BLA	Status Date
5.3 Incorporate analysis of cost-effectiveness of overtime and alternatives to overtime use to accomplish tasks or program objectives into the annual budget.		X		Conducting a "cost effectiveness analysis" would require a review of using overtime to accomplish a task or objective as compared to some other scenario. Under normal circumstances, the appropriate analysis would be to compare using on-duty resources to using overtime. However, this analysis would be unnecessary because using on duty resources is always lower cost and would be more COST effective (assuming the outcomes are the same). However, under current staffing levels in which no on-duty resources are available for special initiatives and SFPD uses overtime to fill core services, the only comparison available is between conducting the operation/deployment and not doing so. Evaluating what would have occurred without the police action is a difficult, if not impossible, analysis. However, as non-sworn resources allow, SFPD will consider ways to look at costs in tandem with reviews of the outcomes of an operation/deployment.	
5.4 When the Police Department requests a supplemental appropriation for overtime expenditures, as required in Administrative Code Section 3.17, provide an update on its implementation of overtime controls and civilianization as part of the supplemental appropriation request.		X		SFPD partially agrees with this recommendation. Updates regarding overtime controls are appropriate to a de-appropriation/re-appropriation request or supplemental appropriation. However, hiring civilians has little-to-no impact on sworn overtime costs and improvements to the use of civilians is discussed and considered in the annual budget process.	
5.5 Require station captains, if they exceeded their biweekly overtime budgets, to justify the circumstances that required exceeding their budget.	X			Since the BLA's fieldwork, SFPD has established a process for Captains to provide justification should they exceed their overtime budget. Captains submit a memo to their Commanders, after which the Commanders discuss these justifications with the Captains and where necessary, make overtime allotment adjustments.	