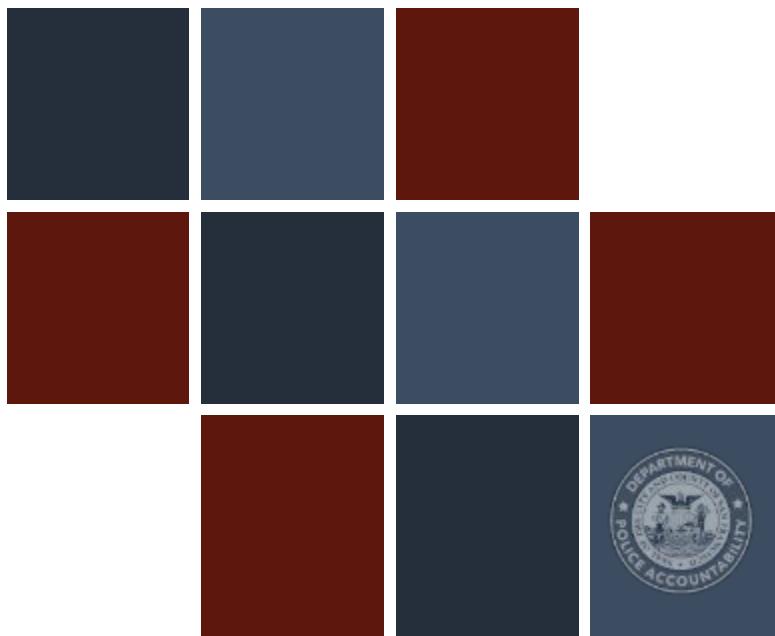


San Francisco Police Department: Opportunities Exist to Strengthen Use-of-Force Oversight

This audit fulfills the San Francisco Charter requirement that the Department of Police Accountability regularly audit or review the Police Department's use of force and handling of police misconduct.



December 31, 2025

**SAN FRANCISCO
DEPARTMENT OF
POLICE ACCOUNTABILITY
Audit Division**



Executive Summary

Background

In 2016, the U.S. Department of Justice (U.S. DOJ) found that the San Francisco Police Department (SFPD) did not adequately investigate officer use of force.

The California Department of Justice (Cal DOJ) later assumed oversight of SFPD's reform efforts. Cal DOJ determined that SFPD was substantially compliant with the recommendations associated with the U.S. DOJ's finding, citing the supervisory responsibilities outlined in the department's use-of-force policy, Department General Order 5.01 (DGO 5.01).

Under DGO 5.01, supervisors must evaluate whether an officer's use of force appears reasonable and is within policy.

Objective & Scope

This audit assessed the effectiveness of SFPD's processes for monitoring use-of-force incidents. The audit considered use-of-force incidents from May 2024 to March 2025.

Why We Did This Audit

Communities have a strong interest in ensuring that interactions with law enforcement will be fair, consistent with constitutional and statutory requirements, and guided by public safety. Vesting officers with the authority to use force requires monitoring, evaluation, and a careful balancing of all interests.

Key Findings

Process limitations reduce SFPD's ability to show that use-of-force evaluations are consistent, thorough, and objective.

- The use-of-force evaluation form does not fully capture supervisory responsibilities required by DGO 5.01, which limits SFPD's ability to show that reviews are thorough.
- Supervisors are not required to describe the basis for their compliance determinations, leaving the department without clear reasons for these decisions.
- SFPD does not have policy requirements for how lieutenants and captains should review evaluations, limiting the department's ability to ensure that these members provide consistent oversight.
- Gaps in policy and system controls limit SFPD's ability to show that use-of-force evaluations are objective.

In addition, limitations in data access and informal practices may hinder SFPD's ability to use use-of-force evaluations to improve training.

- SFPD's transition of the evaluation form to a new system disrupted the Training Division's direct access to aggregate use-of-force data.
- The Training Division does not have formal procedures for analyzing use-of-force data, which may hinder its ability to consistently identify trends and assess training effectiveness.

Recommendations

DPA made 14 recommendations to strengthen SFPD's use-of-force oversight. SFPD concurred with two recommendations, partially concurred with seven, and did not concur with the remaining five.

Contents

Executive Summary.....	2
Background.....	5
Finding 1 – Process limitations reduce SFPD’s ability to show that use-of-force evaluations are consistent, thorough, and objective.....	7
1.1 – The evaluation form does not fully capture supervisory responsibilities required by DGO 5.01, which limits SFPD’s ability to show that reviews are thorough.....	7
1.2 – Supervisors are not required to describe the basis for their compliance determinations, leaving the department without clear reasons for these decisions.....	8
1.3 – SFPD does not have policy requirements for how lieutenants and captains should review evaluations, limiting the department’s ability to ensure that these members provide consistent oversight.	9
1.4 – Gaps in policy and system controls limit SFPD’s ability to show that use-of-force evaluations are objective.....	11
1.5 – Discrepancies in reviewer identities and timing reduce the reliability of use-of-force evaluation forms.	12
1.6 – Gaps in form numbers limit SFPD’s ability to show that its use-of-force evaluation records are complete.	14
Finding 2 – Data access limitations and informal practices may hinder SFPD’s ability to use use-of-force evaluations to improve training.....	14
2.1 – SFPD’s transition of the evaluation form to a new system disrupted the Training Division’s access to aggregate use-of-force data.	14
2.2 – The Training Division does not have formal procedures for analyzing use-of-force data, which may hinder its ability to consistently identify trends and assess training effectiveness.	15
2.3 – SFPD’s use-of-force evaluation procedures do not require supervisors to document recommendations regarding training, equipment, or policy, which may limit the department’s ability to systematically capture information that could inform improvements to officer safety and performance.....	16
Finding 3 – Use-of-force reporting and audit practices limit SFPD’s ability to show internal accountability and effective oversight.	17
3.1 – SFPD does not have formal procedures to help ensure consistent, accurate reporting of use-of-force incidents to the California Department of Justice.....	17

3.2 – The Early Intervention System Unit’s use-of-force audits did not align with its policy requirements, limiting the SFPD’s ability to ensure documentation quality and efficient use of resources.....	18
3.3 – The Risk Management Office did not produce use-of-force reports required by DGO 5.01, which may limit command staff oversight.....	19
3.4 – Supervisors must complete a duplicative use-of-force log, which may reduce time available for incident evaluation.....	20
Appendix A – Audit Objective, Scope, and Methodology	21
Appendix B – Review of DPA-Sustained Use-of-Force Allegations	23
Appendix C – SFPD’s Response.....	24
Appendix D – DPA Recommendations and SFPD Responses	28
Appendix E – DPA Evaluation of SFPD’s Responses	34

Background

In 2016, the U.S. Department of Justice (U.S. DOJ) found that the San Francisco Police Department (SFPD) did not adequately investigate officer use of force.¹ The U.S. DOJ stated that it was not always clear what action sergeants took regarding the interview of witnesses, documentation of injury, or decisions relative to the use of force.

The California Department of Justice (Cal DOJ) later assumed oversight of SFPD's reform efforts. Cal DOJ determined that SFPD was substantially compliant with the recommendations associated with the U.S. DOJ's finding, citing the supervisory responsibilities outlined in the department's use-of-force policy, Department General Order (DGO) 5.01.

When notified of a reportable use of force, supervisors must conduct an evaluation.

Under DGO 5.01, all uses of force are reportable, except when the officer's physical interaction with a subject does not cause pain or injury, or the subject does not report pain or injury.²

Officers must notify their supervisor immediately, or as soon as practical, of any reportable use of force. When notified, supervisors must immediately respond to the scene, ensure witnesses are identified and interviewed, review body-worn camera footage and other relevant evidence, and notify a superior officer if the force was unnecessary or resulted in serious bodily injury or death. DGO 5.01 requires supervisors to determine whether the force used appears reasonable and within the provisions of the order. Supervisors must document their evaluation in a Supervisory Use of Force Evaluation Form (SUOFE) by the end of watch.

DGO 5.01 states that the U.S. Supreme Court, in *Graham v. Connor*, held that an officer's use of force must be objectively reasonable under the totality of circumstances known to the officer at the time. The policy states that the objective reasonableness of a particular use of force must be judged from the perspective of a reasonable officer on the scene, rather than 20/20 hindsight, and without regard to the officer's underlying intent or motivation.

DGO 5.01 lists factors for evaluating the use of force, such as the officer's tactical conduct and decisions preceding the use of force, and whether the officer assessed the subject's ability to cease resistance or comply with commands.

On May 15, 2024, SFPD transitioned the SUOFE from an internal system to the vendor Benchmark Analytics. Between May 15, 2024, and March 31, 2025, supervisors submitted 994 SUOFEs.

Exhibit 1 summarizes the supervisory determinations recorded in these evaluations.

¹ U.S. DOJ, Office of Community Oriented Policing Services, *Collaborative Reform Initiative: An Assessment of the San Francisco Police Department*, 2016.

² DGO 5.01, *Use of Force Policy and Proper Control of a Person*, effective October 2024.

Exhibit 1 – Supervisory evaluation determinations recorded from May 15, 2024, to March 31, 2025.

Supervisors record a separate determination for each officer who used force. One Supervisory Use of Force Evaluation Form may contain multiple determinations.

Evaluation Determination	Count	Percent
Within Policy	1,900	99%
Determination Pending Investigation ^a	21 ^b	1%
Not Within Policy	-	-
Total	1,921	100%

Note:

^a Under DGO 5.01, supervisors must select “Pending Investigation” for any use of force involving the discharge of a firearm, the use of the deflection vehicle pursuit intervention technique, the application of any other deadly force, or the use of low or intermediate force that results in death or serious bodily injury.

^b Of the 21 pending determinations, 13 involved officer-involved shootings, 4 involved the pointing of a firearm, 3 involved extended-range impact weapons, and 1 involved a physical control hold/take-down.

Source: Auditor analysis of SFPD data and DGO 5.01.

Why We Did This Audit

The San Francisco Charter requires the Department of Police Accountability (DPA) to regularly audit or review SFPD’s use of force and handling of police misconduct.^{3,4} Communities have a strong interest in ensuring that interactions with law enforcement will be fair, consistent with constitutional and statutory requirements, and guided by public safety. Accordingly, the authority to use force is a serious responsibility given to peace officers and must be exercised judiciously to safeguard the life, dignity, and liberty of all persons without prejudice.⁵ Vesting officers with the authority to use reasonable force requires monitoring, evaluation, and a careful balancing of all interests.⁶

Prior Department of Police Accountability Use-of-Force Audit Work

This is DPA’s second performance audit of SFPD’s use of force. The first, issued jointly with the Office of the Controller, found that SFPD’s approach to collecting use-of-force data was effective but that the department did not analyze this data, causing missed opportunities to improve departmentwide monitoring of policy compliance.⁷ As of December 2024, one recommendation from that audit remained open.⁸

³ *San Francisco Charter, Section 4.136, Department of Police Accountability.*

⁴ Of incidents in the 994 SUOFEs, DPA sustained two allegations of unnecessary force. See Appendix B.

⁵ California Commission on Peace Officer Standards and Training (POST), *Use of Force Standards and Guidelines*, 2021.

⁶ California Senate Bill 230, *Law Enforcement: Use of Deadly Force: Training: Policies*, published 2019.

⁷ DPA and Office of the Controller, *The Police Department Needs Clearer Guidance and More Proactive Governance for Better Use-of-Force Data Collection and Reporting*, 2020.

⁸ Office of the Controller, *City Services Auditor Summary of the Implementation Status of Recommendations, July 1 Through December 31, 2024*, 2025. The report stated that SFPD is “working on integrating the new data with old data for tasks such as generating reports and processing [Early Intervention System] alerts.”

Finding 1 – Process limitations reduce SFPD’s ability to show that use-of-force evaluations are consistent, thorough, and objective.

1.1 – The evaluation form does not fully capture supervisory responsibilities required by DGO 5.01, which limits SFPD’s ability to show that reviews are thorough.

The SUOFE does not fully capture all supervisory responsibilities required by DGO 5.01. As a result, SFPD cannot rely on the SUOFE to show that supervisors completed all required review steps.

The Police Executive Research Forum (PERF) states that supervisors must provide a level of review that will not have to be duplicated at other staff positions.⁹ However, the form’s design may limit the ability of supervisors to show subsequent reviewers, like lieutenants and captains, that they thoroughly and consistently review use-of-force incidents. For example:

- **Witness Interviews:** The U.S. DOJ stated that it was not always clear what, if any, action SFPD sergeants took regarding witnesses, noting “minimal documentation” and “no separate or summarized” interviews. However, the SUOFE does not include fields for supervisors to indicate whether they interviewed witnesses or to describe any statements obtained. The Los Angeles Police Department (LAPD) is an example of a law enforcement agency that requires supervisors’ notes to address conflicts or discrepancies between the statements provided by a witness or the subject of the force and statements provided by the involved department employees.¹⁰
- **Body-Worn Camera Review:** Supervisors confirm body-worn camera review with a single Yes/No toggle. However, the form does not capture which officers’ recordings the supervisor reviewed or the time frames relevant to the evaluation. In multi-officer incidents, this may limit a subsequent reviewer’s ability to efficiently identify which footage the supervisor considered relevant. LAPD requires supervisors to identify the time frames relevant to the use of force and electronically “bookmark” those portions so that subsequent reviewers can make an informed recommendation or adjudication.¹¹
- **Review of Other Available Evidence:** The U.S. DOJ reported that SFPD’s use-of-force investigations showed “no analysis of the event from an evidentiary standpoint.” While the form has fields that capture the existence of other evidence, such as other video footage and photos of the subject’s injury, it does not require the supervisor to describe how that evidence informed the evaluation.

⁹ PERF, *Critical Issues in Policing Series: Strategies for Resolving Conflict and Minimizing Use of Force*, 2007. PERF is an independent research organization that focuses on critical issues in policing.

¹⁰ LAPD, Manual Volume 4, Quarter 1, 2025.

¹¹ Ibid.

The U.S. Government Accountability Office (GAO) states that management should identify the information requirements needed to achieve objectives and address risks, considering the expectations of both internal and external users.¹²

The U.S. DOJ recommended that SFPD create an on-scene checklist for use-of-force incidents. Cal DOJ reported that, instead of doing so, SFPD opted to revise DGO 5.01 to include a list of tasks for supervisors and make the policy accessible via officers' department-issued cell phones. While Cal DOJ deemed this approach substantially compliant, it did not evaluate whether it enabled SFPD to show that supervisors completed all required tasks.¹³

RECOMMENDATION

1. The San Francisco Police Department should ensure that the Supervisory Use of Force Evaluation Form captures evidence that shows supervisors have completed all responsibilities required by DGO 5.01.

1.2 – Supervisors are not required to describe the basis for their compliance determinations, leaving the department without clear reasons for these decisions.

Supervisors are not required to describe the basis for their compliance determinations. This limits SFPD's ability to use the SUOFE to show supervisors' analysis of the event, including how supervisors applied the evaluation factors provided by DGO 5.01. As a result, subsequent SUOFE reviewers, like lieutenants and captains, may not readily understand how the supervisor reached a conclusion.

SFPD reported to Cal DOJ that the SUOFE "existed as a method to collect data."¹⁴ The form requires supervisors to enter incident details and select a compliance determination from a dropdown menu. A prior version of the SUOFE instructed supervisors to numerically sequence the subject's resistance and force used. According to Cal DOJ, that approach, combined with a chart in DGO 5.01 that lists the level of force an officer could possibly use in response to a subject's level of resistance, enabled SFPD leadership up the chain of command to determine the reasonableness of the force used.¹⁵ However, SFPD discontinued this requirement when it transitioned the SUOFE to Benchmark Analytics, which may reduce the form's usefulness as a standalone record for subsequent reviewers to understand how supervisors reached their determinations.

A representative from SFPD's Training Division stated that supervisors could use the SUOFE's comments field to memorialize how they arrived at their conclusion. However, supervisors are not required to complete this field, and the form does not provide guidance on what to enter. In practice, supervisors completed the comments field in 18% (182 of 994) of evaluations. When present, comments included entries such as review steps (e.g., "Reviewed all available BWC") or restated the conclusion (e.g., "In policy").

¹² GAO, *Standards for Internal Control in the Federal Government*, 2014.

¹³ SFPD, Collaborative Reform Completion Memorandum for Recommendation 18.2, 2020.

¹⁴ SFPD, Collaborative Reform Completion Memorandum for Recommendation 5.2, 2020.

¹⁵ SFPD, Collaborative Reform Completion Memorandum for Recommendation 4.2, 2020.

The GAO states that management should ensure appropriate documentation of transactions and other significant events in a manner that allows the documentation to be readily available for examination.¹⁶ LAPD is an example of an agency that requires reviewers to comment on the use-of-force incident. It requires a watch commander or officer-in-charge to address the involved employees' adherence to requirements like objective reasonableness, de-escalation techniques, and proportionality.¹⁷ These reviewers must also provide a rationale if de-escalation was not feasible.¹⁸

In its final report, the consultant hired to assist Cal DOJ with monitoring stated that SFPD should ensure that supervisors develop skills to assess the consistency of a use of force with policy. It stated it looked forward to SFPD "enhancing its focus on the efficacy and quality" of supervisor determinations, and cited the process used by the department's Field Tactics Force Options Unit (FTFO) as an example.¹⁹

FTFO's analysis focuses on the member's management of and response to the totality of circumstances encountered. FTFO organizes analysis into four phases that it considers most critical to incidents, resulting in a summary report that can include recommendations for training or suggestions for alternative actions.²⁰ Providing similar structure within the SUOFE could help supervisors support their determinations, giving subsequent reviewers clearer insight into those decisions. It could also help the department identify where supervisors may need additional guidance or training to strengthen the consistency of evaluations.

RECOMMENDATION

2. The San Francisco Police Department should ensure that the Supervisory Use of Force Evaluation Form captures the basis for policy-compliance determinations. If the department determines that the form's existing comments field can serve this purpose, it should require supervisors to complete it and provide formal guidance on what information the field should contain.

1.3 – SFPD does not have policy requirements for how lieutenants and captains should review evaluations, limiting the department's ability to ensure that these members provide consistent oversight.

SFPD does not have policy requirements for how lieutenants and captains should review use-of-force evaluations.²¹ This limits the department's ability to ensure that these members provide consistent oversight.

¹⁶ GAO, *Standards for Internal Control in the Federal Government*, 2014.

¹⁷ LAPD, Notice 1.3, Use of Force Adjudications, 2023.

¹⁸ LAPD, Manual Volume 4, Quarter 1, 2025.

¹⁹ Jensen Hughes, *San Francisco Police Department Collaborative Reform Initiative: Final Report*, 2025.

²⁰ FTFO, *Reference Guide*, 2023. The four phases are pre-deployment, arrival/engagement, use of force/tactics, and resolution.

²¹ SFPD stated that it allows sergeants to approve evaluations at the lieutenant level and lieutenants to sign off at the captain level. According to SFPD, reviewer assignments are flexible because supervisors may serve in acting roles. This

U.S. DOJ guidance states that lieutenants and captains should both be required to reach an evaluative conclusion, assessing both the conduct of the officer involved and the evaluation of the previous supervisor.²²

Although DGO 5.01 does not require three levels of review, SFPD stated that it designed the SUOFE workflow to require sign-offs from a supervisor, lieutenant (or officer-in-charge), and captain.²³ While Benchmark Analytics records when lieutenants and captains sign off on an evaluation, the form does not capture what information they reviewed or how they assessed it. Exhibit 3 shows that nearly all of the 994 SUOFEs advanced through lieutenant- and captain-level reviews.

Exhibit 3 – Lieutenants and captains signed off on nearly all 994 use-of-force evaluations, but the form does not capture the substance of their reviews.

Lieutenant sign-offs occurred a median of 34 minutes after supervisor review, while captain sign-offs occurred a median of 1.8 days after the lieutenant's review. Although Benchmark Analytics records when these sign-offs occur, the evaluation form does not capture the substance of their reviews, limiting SFPD's ability to contextualize these review times.

Review Stage	Count	% of Total Evaluations	Median Time
Lieutenant/Officer-in-Charge sign-off	985	99%	34 minutes after supervisor submission
Captain sign-off	940	95%	1.8 days after lieutenant sign-off

Source: Auditor analysis of SFPD data.

In 2016, the U.S. DOJ reported that SFPD's use-of-force incidents were "normally treated as final investigations upon the supervisors' review." In 178 evaluations (18%), a lieutenant or captain returned the form for more information. However, the SUOFE does not capture the reasons for these returns. A prior version of the SUOFE included checkboxes for lieutenants and captains to indicate their review of incident reports and body-worn camera footage, but these fields are not in the Benchmark Analytics version.

Other law enforcement agencies have policies describing the responsibilities of higher-level reviewers. For example, LAPD requires watch commanders or officers-in-charge to evaluate the existence and effectiveness of supervisory command and control.²⁴

audit refers to reviewers by their designated review level on the SUOFE (e.g., lieutenant/officer-in-charge-level and captain-level), regardless of the reviewer's actual rank.

²² U.S. DOJ, National Institute of Justice, *Measuring What Matters*, 1999.

²³ DGO 5.01 assigns specific responsibilities to superior officers only when a supervisor determines that force was excessive or resulted in serious bodily injury or death.

²⁴ LAPD, *Volume 4, Quarter 1, 2025*.

The Oakland Police Department requires commanders to evaluate and document whether the use of force complied with policy and comment on any training and tactical issues.²⁵

RECOMMENDATION

3. The San Francisco Police Department should define the responsibilities of lieutenants and captains when reviewing a Supervisory Use of Force Evaluation Form. As necessary, it should incorporate these responsibilities into DGO 5.01, or another applicable written directive, and ensure the evaluation form captures the substance of their reviews.

1.4 – Gaps in policy and system controls limit SFPD’s ability to show that use-of-force evaluations are objective.

SFPD’s evaluation process does not ensure an objective, multi-level review of use-of-force incidents. Of the 994 SUOFEs, there were:

- ◆ 7 instances in which the officer who used force also submitted the SUOFE for that incident.
- ◆ 2 instances in which the officer who used force served as SUOFE’s second-level reviewer.
- ◆ 19 instances in which a single officer submitted and closed the SUOFE.

In 2016, the U.S. DOJ told SFPD that it is “unacceptable” for an officer who used force to complete the investigation. Such instances limit SFPD’s ability to show that evaluations of use-of-force incidents are objective and reduce the reliability of these policy-compliance determinations.

DGO 5.01 states that when the officer using force is a supervisor, another supervisor or superior officer must conduct the evaluation. The GAO states that management should divide or segregate key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This should include separating responsibilities for authorizing, processing, recording, and reviewing the transactions so that no one individual controls all key aspects of a transaction or event.²⁶

The Oakland Police Department is an example of a law enforcement agency that prohibits a supervisor or commander involved in the use of force from investigating or reviewing the report for approval.²⁷

According to SFPD, Benchmark Analytics lacks controls to prevent self-review or prevent one individual from completing all review stages. As noted in Finding 1.3, DGO 5.01 does not require multi-level review, so the policy does not address whether it is permissible for an officer who used force to participate in later stages of the form review process or for one officer to perform multiple approval roles within the same evaluation.

²⁵ Oakland Police Department, *General Order K-4 Reporting and Investigating the Use of Force*, 2014.

²⁶ GAO, *Standards for Internal Control in the Federal Government*, 2014.

²⁷ Oakland Police Department, *General Order K-4 Reporting and Investigating the Use of Force*, 2014.

RECOMMENDATIONS

The San Francisco Police Department should:

4. Work with Benchmark Analytics to implement controls to prevent officers from evaluating their own use of force. If Benchmark Analytics cannot implement these controls, the department should develop an alternative process to detect and review these incidents.
5. Formally review DGO 5.01 and the Supervisory Use of Force Evaluation Form workflow to determine whether current requirements clearly define who may participate in each stage of review and whether multiple approval roles by the same individual are permissible. As necessary, the department should revise DGO 5.01 or issue a department notice to clarify whether a supervisor involved in a use-of-force incident may serve as a later-stage reviewer or whether a supervisor may perform more than one approval role within the same evaluation.

1.5 – Discrepancies in reviewer identities and timing reduce the reliability of use-of-force evaluation forms.

The SUOFE requires officers to manually enter reviewer names and sign-off times. As a result, SUOFEs can show names and review times that differ from those automatically recorded by Benchmark Analytics.

Of the 994 SUOFEs, 57 (6%) contained discrepancies at the captain level and 102 (10%) contained discrepancies at the lieutenant/officer-in-charge level. These discrepancies limit SFPD's ability to reliably show who reviewed an incident and when the review occurred, weakening accountability for use-of-force evaluations.

Exhibit 4 shows an example of a captain-level discrepancy.

Exhibit 4 – A discrepancy in final reviewers reduces the reliability of a Supervisory Use of Force Evaluation Form.

The table below compares the system-generated log with the manually completed Supervisory Use of Force Evaluation Form for a single evaluation. The two sources show different names for the final review stage. Such discrepancies reduce the reliability of the evaluation form as a record of who reviewed an incident.

Review Stage	System Log Reviewer/Time (automatically recorded)	Form Reviewer/Time (manually entered by officer)	Discrepancy Identified
Supervisor	Sergeant 1 at 18:59 ^a	Sergeant 1 at 18:50	
Lieutenant/Officer-in-Charge	Sergeant 2 at 21:41	Sergeant 2 at 21:32	Conflicting sign-off times.
Captain	Sergeant 2 at 21:42	Captain at 21:41	Conflicting reviewer names. The form shows the Captain as the third reviewer, but other records show that the Captain was not on duty. ^b

Notes:

^a Sergeant 1 used force and submitted the evaluation form; see [Finding 1.4](#).

^b SFPD stated that Sergeant 2 may have mistakenly routed the form to themselves instead of the intended captain and then unknowingly approved it at that level.

Source: Auditor analysis of Benchmark Analytics data and the SUOFE associated with this incident.

DGO 5.01 does not address whether supervisors are allowed to complete or sign off on an evaluation form on behalf of another officer. The GAO states that management should ensure that transactions are authorized and executed only by persons acting within the scope of their authority, and that management should design control activities so that all transactions are completely and accurately recorded. According to the GAO, automated control activities tend to be more reliable because they are less susceptible to human error and are typically more efficient.²⁸

SFPD stated that discrepancies may occur because officers are confused by the system's user interface. According to the department, it is working with Benchmark Analytics and sending emails to officers to address this issue.

²⁸ GAO, *Standards for Internal Control in the Federal Government*, 2014.

RECOMMENDATION

6. The San Francisco Police Department should work with Benchmark Analytics to eliminate the manual entry of reviewer information and automatically capture that information based on authenticated user actions within the system. If this is not feasible, the department should implement alternative controls to detect and address discrepancies.

1.6 – Gaps in form numbers limit SFPD’s ability to show that its use-of-force evaluation records are complete.

There are gaps in the SUOFE numbering sequence. The largest gap included 103 consecutive form numbers, and there were four additional gaps of 32 consecutive numbers. These gaps limit SFPD’s ability to show the completeness of its use-of-force evaluation records.

SFPD stated that supervisors can delete reports before submitting them, and that Benchmark does not reuse the numbers. The GAO states that management should design controls over information processing, including accounting for transactions in numerical sequences.²⁹

RECOMMENDATION

7. The San Francisco Police Department should work with Benchmark Analytics to implement controls to account for every Supervisory Use of Force Evaluation Form.

Finding 2 – Data access limitations and informal practices may hinder SFPD’s ability to use use-of-force evaluations to improve training.

2.1 – SFPD’s transition of the evaluation form to a new system disrupted the Training Division’s access to aggregate use-of-force data.

SFPD could not load SUOFE data from Benchmark Analytics into its business intelligence (BI) system. This disrupted the Training Division’s Field Tactics Force Options Unit’s (FTFO) direct access to aggregate use-of-force data.

In 2016, the U.S. DOJ recommended that SFPD “synthesize” the issues emerging from use-of-force reports. In response, SFPD told Cal DOJ that it launched FTFO “to ensure timely and effective response to identified, emerging trends” and that it developed a BI dashboard through which FTFO “can pull and review fundamental, real-time data” to consider the “effectiveness and consistency” of training.³⁰

²⁹ GAO, *Standards for Internal Control in the Federal Government*, 2014.

³⁰ SFPD, Collaborative Reform Completion Packet for Recommendation 4.7, 2020.

DGO 5.01 requires the Technology Division to ensure that the Training Division has access to use-of-force reports and evaluations. SFPD stated that it transitioned the SUOFE to Benchmark without ensuring a data pipeline to other department systems. According to a Technology Division representative, SFPD received the first set of SUOFE data extracts from Benchmark Analytics after the go-live date, in October 2024, but these and subsequent extracts contained issues, such as missing index keys and duplicated officer names, that required the vendor to fix the files.

RECOMMENDATIONS

8. The San Francisco Police Department should load current, reliable use-of-force data from Benchmark Analytics into its business intelligence system. Until that integration is complete, the department should ensure that the Training Division has direct access to current, reliable, aggregate use-of-force data.

2.2 – The Training Division does not have formal procedures for analyzing use-of-force data, which may hinder its ability to consistently identify trends and assess training effectiveness.

The Training Division does not have formal procedures for analyzing use-of-force data. This may hinder SFPD's ability to ensure that the Division consistently uses data to identify emerging trends and assess training effectiveness.

DGO 5.01 requires the Training Division to "systematically" review, examine, and assess use-of-force data to identify and address training needs and efficacy. SFPD told Cal DOJ that FTFO is tasked with "specific and generalized" reviews of use-of-force incidents.³¹ While the unit's reference guide addresses reviews of individual incidents, it does not address the use of aggregate data. FTFO stated that one officer performs the data analysis required by DGO 5.01 and that a successor could reference this officer's prior work products.

The GAO states that management should document, in policies for each unit, its responsibility for an operational process's objectives. Those in key roles for the unit may further define policies through day-to-day procedures that may include the timing of when a control activity occurs and any follow-up corrective actions to be performed if deficiencies are identified.³² The San Diego Police Department is an example of an agency that has documented use-of-force data analysis procedures in an operations manual.³³ This manual provides officers assigned to the department's Force Analysis Unit with documented goals, objectives, tasks, and responsibilities intended to help identify strengths in current practices and recommend changes in training based on identified trends.

³¹ SFPD, Collaborative Reform Completion Memorandum for Recommendation 4.7, 2020.

³² GAO, *Standards for Internal Control in the Federal Government*, 2014.

³³ San Diego Police Department, Force Analysis Unit Operations Manual, April 2024.

RECOMMENDATION

9. The San Francisco Police Department should develop written procedures that define who in the Training Division is responsible for reviewing use-of-force data, including how frequently reviews will occur, and how findings will inform training.

2.3 – SFPD’s use-of-force evaluation procedures do not require supervisors to document recommendations regarding training, equipment, or policy, which may limit the department’s ability to systematically capture information that could inform improvements to officer safety and performance.

SFPD’s use-of-force evaluation procedures do not require supervisors to document recommendations regarding training, equipment, or policy. This may limit the department’s ability to systematically capture information that could support the development of strategies and tactics that improve officer safety and performance.

As part of use-of-force review, POST states that supervisors should promptly address any areas of concern, including notification of appropriate personnel in the chain of command, potential policy changes, training needs, weapons or equipment issues, and/or discipline (administrative investigation). According to POST, any recommendations to modify policy, apply remedial training beyond what can be performed by the supervisor, recommended changes to weapons or equipment, or to apply discipline should be documented in a report and submitted to appropriate agency personnel.³⁴ The Oakland Police Department is an example of an agency that requires reviewing commanders to consider policy revisions, equipment evaluations, or new department publications, and forward recommendations to the Chief.³⁵

While DGO 5.01 requires supervisors to report unnecessary force to superior officers, it does not require them to consider, document, and route other concerns or recommendations. FTFO’s reference guide allows for “informal review” of incidents sent to the unit by command staff and members for their education and development, but it does not specify if these reviews are tracked or how they inform training, equipment, or policy decisions. In addition, neither DGO 5.01 nor the SUOFE makes supervisors aware of this option. Although DGO 3.01, *Department Written Directives*, provides procedures for initiating or amending written directives through the chain of command, it is separate from the use-of-force evaluation process.³⁶

³⁴ POST, *Use of Force Standards and Guidelines*, 2021. POST states that these guidelines incorporate best practices and are intended to support the development of effective training, agency policies, and internal accountability measures that promote expanded strategies and tactics that safeguard the lives of officers and the communities they serve.

³⁵ Oakland Police Department, *General Order K-4 Reporting and Investigating the Use of Force*, 2014.

³⁶ DGO 3.01, *Department Written Directives*, revised July 2022.

DGO 3.10, *Serious Incident Review Board*, takes effect in June 2025.³⁷ The purpose of the board is to review designated use-of-force and critical incidents, opine on matters including policy, training, and tactics, and make recommendations to the Chief. However, this policy applies to specific types of incidents, including those involving the use of deadly force, the use of force resulting in hospitalization, and officer-involved discharges. Although the Chief can designate other incidents for review, this policy does not provide supervisors with a mechanism for elevating recommendations from use-of-force incidents outside the board's scope.

RECOMMENDATION

10. The San Francisco Police Department should establish procedures within its use-of-force evaluation process for supervisors to consider and document recommendations regarding training, equipment, or policy.

Finding 3 – Use-of-force reporting and audit practices limit SFPD’s ability to show internal accountability and effective oversight.

3.1 – SFPD does not have formal procedures to help ensure consistent, accurate reporting of use-of-force incidents to the California Department of Justice.

SFPD does not have documented procedures for identifying and reporting qualifying use-of-force incidents to Cal DOJ.³⁸ Without such procedures, SFPD may be limited in its ability to ensure the completeness and accuracy of reported information and manage risk associated with staff turnover.

State law requires agency use-of-force policies to include “comprehensive and detailed requirements for prompt internal reporting and notification regarding a use of force incident, including reporting use-of-force incidents to [Cal DOJ]” as required by Section 12525.2 of the Government Code.³⁹ LAPD is an example of a law enforcement agency that references Government Code Section 12525.2 in its manual, assigns reporting responsibilities to specific divisions, and identifies the categories of incidents subject to reporting.⁴⁰

DGO 5.01 does not reference Cal DOJ reporting requirements. Between May 2024 and March 2025, SFPD reported nine incidents to Cal DOJ. SFPD stated that this process relied on civilian analysts reviewing SUOFE data and determining which incidents to report. According to SFPD, it is developing procedures to formalize Cal DOJ reporting requirements.

³⁷ DGO 3.10, *Serious Incident Review Board*. Approved by the Police Commission in October 2024, effective June 2025.

³⁸ California Government Code Section 12525.2(a) requires law enforcement agencies to furnish to Cal DOJ monthly a report of all instances in which a peace officer is involved in the following: the shooting of a civilian by a peace officer, an incident involving the shooting of a peace officer by a civilian, an incident in which the use of force by a peace officer against a civilian results in serious bodily injury or death, and an incident in which use of force by a civilian against a peace officer results in serious bodily injury or death.

³⁹ California Government Code Section 7286(b)(13).

⁴⁰ Los Angeles Police Department Manual, *Volume 4, Quarter 1, 2025*.

RECOMMENDATION

11. The San Francisco Police Department should formalize procedures for reporting incidents to the California Department of Justice and incorporate them into Department General Order 5.01 or another applicable written directive.

3.2 – The Early Intervention System Unit’s use-of-force audits did not align with its policy requirements, limiting the SFPD’s ability to ensure documentation quality and efficient use of resources.

The Early Intervention System (EIS) Unit’s use-of-force audits did not align with policy requirements.

Exhibit 5 summarizes how the EIS Unit’s audit practices differed from those requirements.

Exhibit 5 – The Early Intervention System Unit’s audits did not align with policy requirements.

Audit Requirement	Required Procedures	Practice	Impact
Use-of-Force Statement Audit Procedure (EIS Unit Order 20-01)	Conduct quarterly audits of officer reports for compliance with DGO 5.01 documentation standards.	Not conducted during the audit period. Staff reported uncertainty about whether the requirement remained in effect but did not identify any formal decision to suspend it.	Without these audits, SFPD loses assurance that officer narratives comply with DGO 5.01 documentation standards. Inadequate documentation can expose both the officer and the agency to civil liability.
Supervisory Use of Force Evaluation Form Audit Procedure (EIS Unit Order 21-01)	Conduct quarterly audits of evaluation forms for accuracy and consistency with incident reports.	Conducted monthly, and included reviews of Use of Force Logs, which is not required by Unit Order 21-01.	Conducting audits using procedures not required by policy may reduce the EIS Unit’s capacity for other tasks that support accountability.

Source: Auditor generated based on review of SFPD policies and audit reports, and interviews with EIS Unit personnel.

EIS Unit personnel described these audits as a legacy practice from when the unit had exclusive access to the department’s use-of-force system, and stated that limited capacity constrains its ability to conduct audit work.

SFPD cited its SUOFE audit requirement in response to a 2016 U.S. DOJ recommendation to hold supervisors accountable for deficiencies in use-of-force data.⁴¹ In its final report, the consultant SFPD hired to assist Cal DOJ noted that the scope of the SUOFE audit is limited to remediating form inaccuracies, as opposed to assessing the adequacy of the supervisor's determinations regarding the use of force.⁴² Re-evaluating the EIS Unit's requirements in response to system changes and the consultant's feedback could help SFPD ensure that its audit efforts strengthen internal accountability.

RECOMMENDATION

12. The San Francisco Police Department should formally determine whether use-of-force audits required by EIS Unit Orders 21-01 and 20-01 remain necessary. If the audits remain necessary, SFPD should ensure they are appropriately assigned and performed as required. If the department determines that the audits are no longer necessary, it should formally retire those requirements. If SFPD determines that other use-of-force audits would better support internal accountability, it should establish and perform them accordingly.

3.3 – The Risk Management Office did not produce use-of-force reports required by DGO 5.01, which may limit command staff oversight.

The Risk Management Office (RMO) stated that it did not produce required use-of-force statistical reports for the Chief. This limits SFPD's ability to show that command staff consistently receive information about departmentwide use-of-force activity.

DGO 5.01 directs the RMO to report twice monthly to the Chief on the use of force and the drawing and exhibiting of firearms by department members. These reports must include statistics consistent with current federal, state, and local laws on use-of-force reporting.

RMO stated it meets weekly with the Chief, and that there would only be written materials if a use of force resulted in an Internal Affairs Division investigation or sustained DPA case. While this approach may provide awareness about individual incidents, it would not provide consistent, departmentwide information that could help leadership make evidence-based decisions regarding policy, equipment, and training needs.

RECOMMENDATION

13. The San Francisco Police Department should clarify the Risk Management Office's responsibility for reporting use-of-force statistics. If statistical reports from the Risk Management Office are necessary, the department should ensure they are produced and retained.

⁴¹ SFPD, Collaborative Reform Completion Memorandum for Recommendation 4.6, 2019.

⁴² Jensen Hughes, *San Francisco Police Department Collaborative Reform Initiative: Final Report*, 2025.

3.4 – Supervisors must complete a duplicative use-of-force log, which may reduce time available for incident evaluation.

Supervisors must document each use-of-force incident in both the SUOFE and a separate log that captures nearly identical information. Maintaining both records may reduce the time supervisors have available to evaluate use-of-force incidents.

DGO 5.01 requires supervisors to complete a use-of-force log and attach a copy to the incident report by the end of watch. Commanding officers must send the logs to their bureau deputy chief and RMO.

In 2016, the U.S. DOJ noted that SFPD relied on incident narratives and paper logs, rather than a dedicated use-of-force report. Although the department subsequently implemented the SUOFE, it retained the log requirement. RMO representatives stated that it receives the logs but does not use them, and that it has not formally discussed whether they remain necessary.

RECOMMENDATION

14. The San Francisco Police Department should formally assess the continued need for the use-of-force log. If the department determines that the log does not serve a distinct function, it should remove the requirement from DGO 5.01. If the department determines that the log remains necessary, it should clearly define its purpose and establish how the information supports oversight or analysis, separate from the Supervisory Use of Force Evaluation Form.

Appendix A – Audit Objective, Scope, and Methodology

Objective and Scope

This audit determined the effectiveness of the San Francisco Police Department's (SFPD) processes for monitoring use-of-force incidents. The audit assessed whether:

- ◆ SFPD's use-of-force review processes support supervisor evaluations of policy compliance.
- ◆ SFPD uses reviews of use-of-force data to identify and address training needs.

The audit considered use-of-force incidents from May 2024 to March 2025.

Methodology

To complete this audit, DPA:

- ◆ Reviewed Department General Order 5.01 and related directives to identify requirements for supervisor evaluations.
- ◆ Issued a survey to gather supervisor perspectives on SFPD's use-of-force review practices. The survey went to 126 supervisors who completed three or more use-of-force evaluations between May 2024 and March 2025. The response rate was approximately 13%.
- ◆ Interviewed personnel from the Training Division, Technology Division, and Risk Management Office.
- ◆ Reviewed the Supervisory Use of Force Evaluation Form (SUOFE) design and workflows.
- ◆ Considered policies and procedures from other law enforcement agencies, including the Los Angeles, Oakland, and San Diego police departments.
- ◆ Considered findings and recommendations from U.S. Department of Justice's 2016 *Collaborative Reform Initiative: An Assessment of the San Francisco Police Department*. We also reviewed SFPD completion memorandums and consultant reports on the department's implementation of those recommendations.
- ◆ Reviewed DPA investigative files and Openness Reports to identify cases relevant to the audit's objective.
- ◆ Evaluated internal controls relevant to the audit objective.

The audit relied on data from Benchmark Analytics. To assess the reliability of this data, we conducted a walkthrough of the SUOFE in Benchmark Analytics to understand how the department enters use-of-force data into the system, reviewed system documentation, performed analytical testing, and followed up on issues with personnel knowledgeable about the data. We also verified that Benchmark Analytics exports included use-of-force incidents discussed in the media and on SFPD's website. Despite the limitations discussed in the report, we determined that the data was sufficiently reliable for addressing the audit objectives.

Statement of Auditing Standards

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.

About the San Francisco Department of Police Accountability's Audit Division

The San Francisco Charter requires DPA to regularly audit or review SFPD's use of force and handling of police misconduct. The Charter also gives DPA the authority to conduct performance audits and reviews to check whether SFPD followed all laws, ordinances, and policies. The Charter grants DPA's executive director the discretion to decide the frequency, topics, and scope of the audits and reviews.

Audit Team

Steve Flaherty, Director of Audits

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Department of Police Accountability

Paul Henderson, Executive Director
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Appendix B – Review of DPA-Sustained Use-of-Force Allegations

Among incidents in the audit population, DPA sustained two allegations of unnecessary force. For each case, DPA reviewed the corresponding Supervisory Use of Force Evaluation Form (SUOFE) to understand how supervisors documented their review of the incidents.

Summary 1:

A sergeant determined that an officer's physical control hold/take-down on a subject complied with policy. The evaluation form contained the following comment: "Viewed surveillance footage from CCTV cameras prior to conducting this investigation." The name of the Captain-level reviewer on the form did not match the reviewer's name recorded by Benchmark.

DPA later sustained that the officer used unnecessary force, stating that the officer's unreasonable perception of the incident created the need to utilize force, rendering the force unlawful. Although SFPD did not concur with DPA, it separately sustained the officer for failing to comply with de-escalation requirements in DGO 5.01.

Summary 2:

A sergeant determined that an officer's physical control hold/take-down and strike by object (personal body weapon/fist) complied with policy. This sergeant routed the form to another sergeant for review. The second sergeant returned the form for more information, but the form does not capture the reason. The form's comments section noted an unsuccessful attempt to obtain surveillance footage and documented that the subject did not respond when asked about pain.

DPA found that the officer's strikes to the subject's head and neck while they were restrained on the ground were excessive, and that the officer used prohibited control holds without an exigent circumstance or monitoring for asphyxia.

During DPA's investigation, the sergeant that evaluated the incident stated that they re-watched the body-worn camera footage with the officer and discussed discrepancies in the officer's account. The sergeant did not document this discussion in the SUOFE's comments field.

DPA recommended a suspension for the officer. SFPD stated it intended to impose a suspension, with a portion held in abeyance for one year, noting that the subject assaulted the officer.⁴³

Source: Auditor review of DPA Openness Reports and investigative case files, and SFPD evaluation data from these incidents.

⁴³ A prior DPA audit found that SFPD lacks written criteria for holding discipline in abeyance. See *The San Francisco Police Department Needs to Improve Policies, Processes, and Data Tracking to Ensure the Timely, Consistent, and Transparent Handling of Officer Misconduct*, December 2023.

Appendix C – SFPD’s Response



DANIEL LURIE
MAYOR

CITY AND COUNTY OF SAN FRANCISCO
POLICE DEPARTMENT
HEADQUARTERS
1245 3RD Street
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PAUL YEP
INTERIM CHIEF OF POLICE

December 2, 2025

Executive Director Paul Henderson
Department of Police Accountability
One South Van Ness Avenue, 8th Floor
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Executive Director Paul Henderson,

The San Francisco Police Department is in receipt of the Department of Police Accountability’s audit entitled: *San Francisco Police Department: Opportunities Exist to Strengthen Use of Force Oversight*. I would like to thank you and your staff for your review of SFPD’s Use of Force policy and practices, which were the successful byproducts of strong collaboration between the Police Commission, SFPD, DPA, and many other stakeholders. These entities worked together, in collaborative and publicly participative ways, during this general order’s three revisions during the years of 2022 and 2023 while under the oversight, review, and successful completion of the Collaborative Reform Initiative for Technical Assistance.

Currently, the SFPD’s Use of Force policy, DGO 5.01 (25 pages), provides detailed guidance on the use of force, including de-escalation, proportionality, supervisory review, and reporting requirements. The policy is complete and consistent with legal standards, including California law and applicable case law, and there are no gaps that hinder effective implementation or oversight. Fortunately, the Department’s current use of force policy closely resembles California Penal Code 835a (revised law effective January 1, 2020). As for supervisory review of reportable use of force, supervisors are trained to assess whether the use of force was reasonable, necessary, and proportional, applying their professional judgement and experience rather than following a rigid written protocol.

At the request of DPA, this letter and the attached grid serves as the Department’s response to this audit.

DPA RECOMMENDATIONS AND SFPD RESPONSES

Finding 1 – Process limitations reduce SFPD’s ability to show that use-of-force evaluations are consistent, thorough, and objective.

1.1 The evaluation form does not fully capture supervisory responsibilities required by DGO 5.01, which limits SFPD’s ability to show that reviews are thorough.

Response: This has been addressed. In early September 2025, required supervisory responsibility fields were added to the supervisory use of force evaluation for all listed supervisory functions in 5.01.

1.2 Supervisors are not required to describe the basis for their compliance determinations, leaving the department without clear reasons for these decisions.

Response: Supervisors are required to evaluate all reportable uses of force. Department policy mandates that supervisors determine whether an officer’s use of force was objectively reasonable under the totality of the circumstances known to the officer at the time of the incident. DGO 5.01.04 provides a list of factors for supervisors to consider in their evaluation.

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If a supervisor is unable to determine whether a use-of-force incident was within policy, they are instructed to select the “Determination Pending Investigation” option in response to the question, “Was the use of force within department policy?” Additionally, if a supervisor concludes that a use-of-force incident was out of policy, they must indicate this on the use-of-force evaluation form. When further analysis is required, the incident will be reviewed by one or more of the following units: DPA, IAD, ISD, and FTFO.

The audit noted that prior department evaluation forms included numerical sequencing of the subject’s resistance and the force used. The current Benchmark use-of-force evaluation form does not include these features due to system constraints; however, the same information can still be obtained through supervisors’ review of body-worn camera footage and the incident narrative/statements (as mandated by DGO 5.01).

1.3 SFPD does not have policy requirements for how lieutenants and captains should review evaluations, limiting the department’s ability to ensure that these members provide consistent oversight.

Response: The captain’s role in this process is arguably not necessary, unless the UOF was used by a lieutenant (and no other supervisor is available) or a UOF incident is determined to be out of policy or “determination pending investigation.” Governing language regarding the responsibilities of lieutenants and captains will be considered via a possible department notice revision of 24-076.

1.4 Gaps in policy and system controls limit SFPD’s ability to show that use-of-force evaluations are objective.

Response: The SFPD acknowledges current system control limitations leave room for improvement, which is why we are aggressively looking for a replacement vendor. When a Benchmark replacement is identified, SFPD will work with the vendor to install technological safeguards and will conduct department-wide training.

SFPD agrees that involved members should not evaluate, nor review, their own force. Here is an excerpt from a department-wide email, “If a supervisor uses force, the Supervisory Use of Force Evaluation shall be completed by another supervisor or superior officer [DGO 5.01.09(A)(2)]. To maintain the objectivity and integrity of the evaluation process, supervisors directly involved in the incident are not allowed to complete, review, or approve the evaluation at any point of the workflow.

1.5 Discrepancies in reviewer identities and timing reduce the reliability of use-of-force evaluation forms.

Response: We are moving away from Benchmark. System limitations within Benchmark have resulted in recurring errors, and SFPD is actively pursuing a new vendor.

1.6 Gaps in form numbers limit SFPD’s ability to show that its use-of-force evaluation records are complete.

Response: We are moving away from Benchmark. System limitations within Benchmark have resulted in recurring errors, and SFPD is actively pursuing a new vendor.

Finding 2 – Data access limitations and informal practices may hinder SFPD’s ability to use use-of-force evaluations to improve training.

2.1 SFPD's transition of the evaluation form to a new system disrupted the Training Division's access to aggregate use-of-force data.

Response: The SFPD acknowledges that there was a lengthy disruption in the Training Division's ability to access use-of-force data through the Benchmark system. This system limitation has been addressed, and the Field Tactics Force Options Unit (Training Division) can now access the relevant data via Business Intelligence. With restored data access, FTFO can continue analyzing data and assessing trends and training needs. It is important to note FTFO continued to evaluate UOF incidents via other means during the disruption time.

2.2 The Training Division does not have formal procedures for analyzing use-of-force data, which may hinder its ability to consistently identify trends and assess training effectiveness.

Response: The access to use of force data with Business Intelligence has been, recently, restored. The Field Tactics Force Options Unit conducts substantive analysis of actual use of force events which they are required or requested to review. In addition, they prepare and instruct on all force options training courses. Through classroom discussions and direct contact, the FTFO staff interact with sworn members and discuss use of force incidents and questions further supporting on going professional development and departmental oversight. Additionally, FTFO actively participates in the Serious Incident Review Board, providing input and guidance on significant use of force events.

2.3 Supervisors do not have a formal way to escalate training, equipment, or policy issues identified during evaluations, which may limit SFPD's ability to improve officer safety and performance. B

Response: Supervisors do have a mechanism to escalate potential training, equipment, and policy issues. They may contact the Field Tactics Force Options Unit for training and equipment concerns, and the Policy Development Unit for policy-related issues. Communication may be made by phone, email, or in person. Additionally, FTFO instruct members during AO/CPT and promotional seminars where in depth use of force training, scenarios, and discussions take place. Any supervisor, at any time, can request the FTFO unit do an analysis of a use of force incident.

Furthermore, Chief of Staff Bureau Order 21-01 (Training Division Refresher Course following OIS and other Serious Incidents) requires members attend refresher training with FTFO after an OIS and/or other serious incident.

Finding 3 – Use-of-force reporting and audit practices limit SFPD's ability to show internal accountability and effective oversight.

3.1 - SFPD does not have formal procedures to help ensure consistent, accurate reporting of use-of-force incidents to the California Department of Justice.

Response: The Risk Management Office and the Business Analysis Team collaborate and report relevant incidents to the California Department of Justice in compliance with the California Government Code.

3.2 - The Early Intervention System Unit's use-of-force audits did not align with its policy requirements, limiting the SFPD's ability to ensure documentation quality and efficient use of resources.

Response: This has been addressed. EIS Unit Order 20-01 Use of Force Statement Audit Procedure has been rescinded. Unit Order 21-01 is still in effect.

3.3 - The Risk Management Office did not produce use-of-force reports required by DGO 5.01, which may limit command staff oversight.

Response: In compliance with DGO 5.01, the Risk Management Office now reports use of force statistics to the Chief of Police on a bi-weekly basis. Additionally, monthly reports are posted on the SFPD department's website.

3.4 - Supervisors must complete a duplicative use-of-force log, which may reduce time available for incident evaluation

Response: The SFPD recognizes that there is redundancy within the Use of Force Log. However, there are operational reasons to retain it at this time. We will continue to evaluate its necessity.

In conclusion, the Department remains committed to continuous improvement and values the collaborative relationship with DPA in ensuring the highest standards of policing for the San Francisco community.

Sincerely,



Paul Yep
Interim Chief of Police
San Francisco Police Department

Appendix D – DPA Recommendations and SFPD Responses

For each recommendation, DPA asked SFPD to indicate whether it concurs, does not concur, or partially concurs. If SFPD concurs with the recommendation, it should indicate the expected corrective action plan, the person or group responsible for the implementation, and the expected date for completing the plan. If SFPD does not concur or partially concurs, it should provide an explanation and an alternate plan of action to address the identified issue.

The San Francisco Police Department Should:	SFPD Response
1. Ensure that the Supervisory Use of Force Evaluation Form captures evidence that shows supervisors have completed all responsibilities required by DGO 5.01.	<input type="checkbox"/> Concur <input checked="" type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur <p>We agree with the substance of this suggestion, however, we do not concur because this has already been addressed and implemented. As of September 4, 2025, required fields were added to the supervisory use of force evaluations (listing supervisory functions in 5.01).</p>
2. Ensure that the Supervisory Use of Force Evaluation Form captures the basis for policy-compliance determinations. If the department determines that the form's existing comments field can serve this purpose, it should require supervisors to complete it and provide formal guidance on what information the field should contain.	<input type="checkbox"/> Concur <input checked="" type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur <p>The reasonableness of a use of force incident is based upon the totality of circumstances that are outlined in case law and already mandated in DGO 5.01.04. There is comprehensive training, internal oversight, and extensive resources that are made available for any supervisor that may need it. In addition to supervisory review and approval, there are also DPA, IAD, SIRB (see DGO 3.10) etc., which all act as oversight of the propriety of the uses of force.</p>

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<p>3. Define the responsibilities of lieutenants and captains when reviewing a Supervisory Use of Force Evaluation Form. As necessary, it should incorporate these responsibilities into DGO 5.01, or another applicable written directive, and ensure the evaluation form captures the substance of their reviews.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>The Captain's role in this process is arguably not necessary, unless the UOF was by a lieutenant (and no other supervisor is available) or a UOF incident is determined to be out of policy or "determination pending investigation."</p> <p>Governing language regarding the responsibilities of lieutenants and captains will be considered via possible DN revision of 24-076.</p> <p>With regard to "the substance of their reviews," we do not concur for the reasons stated in #1 above.</p> <p>Estimated time for completion: TBD pending new vendor selection.</p>
<p>4. Work with Benchmark Analytics to implement controls to prevent officers from evaluating their own use of force. If Benchmark Analytics cannot implement these controls, the department should develop an alternative process to detect and review these incidents.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>We are moving away from Benchmark.</p> <p>5.01.09 states, "A supervisor shall conduct a use of force evaluation in all cases involving a reportable use of force. When the officer using force is a supervisor, another supervisor or superior officer shall conduct the use of force evaluation." The reviewing supervisor should abide and enforce 5.01.09. SFPD agrees that involved members should not evaluate or review their own force, pursuant to our policy. A department-wide email was sent out to all sworn members to remind them of this policy on November 3, 2025 – prior to the final report being published.</p>

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<p>5. Formally review DGO 5.01 and the Supervisory Use of Force Evaluation Form workflow to determine whether current requirements clearly define who may participate in each stage of review and whether multiple approval roles by the same individual are permissible. As necessary, the department should revise DGO 5.01 or issue a department notice to clarify whether a supervisor involved in a use-of-force incident may serve as a later-stage reviewer or whether a supervisor may perform more than one approval role within the same evaluation.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>SFPD agrees that involved members should not evaluate, nor review, their own force. Department-wide email excerpt: <i>"If a supervisor uses force, the Supervisory Use of Force Evaluation shall be completed by another supervisor or superior officer [DGO 5.01.09(A)(2)]. To maintain the objectivity and integrity of the evaluation process, supervisors directly involved in the incident are not allowed to complete, review, or approve the evaluation at any point of the workflow."</i></p> <p>Existing payroll software assist supervisors by rejecting entries that are improper; we hope the new use of Force software vendor will have a similar feature.</p> <p>When a Benchmark replacement is identified, SFPD will work with the vendor to install technological safeguards and will conduct department-wide training.</p>
<p>6. Work with Benchmark Analytics to eliminate the manual entry of reviewer information and automatically capture that information based on authenticated user actions within the system. If this is not feasible, the department should implement alternative controls to detect and address discrepancies.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>We are moving away from Benchmark. System limitations within Benchmark have resulted in recurring errors and SFPD is actively pursuing a new vendor.</p>
<p>7. Work with Benchmark Analytics to implement controls to account for every Supervisory Use of Force Evaluation Form.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>Though we are moving away from Benchmark, every UOF evaluation form, ideally, should be accounted for in numerical order. We will request the new vendor incorporate this recommendation.</p> <p>We do not concur about working with "Benchmark" because we are moving to a new vendor.</p>

<p>8. Load current, reliable use-of-force data from Benchmark Analytics into its business intelligence system. Until that integration is complete, the department should ensure that the Training Division has direct access to current, reliable, aggregate use-of-force data.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>SFPD agrees with this concept. Though there were data access issues via Benchmark, the Field Tactics Force Options Unit of the Training Division, now, has access to the use of force data from Business Intelligence.</p>
<p>9. Develop written procedures that define who in the Training Division is responsible for reviewing use-of-force data, including how frequently reviews will occur, and how findings will inform training.</p>	<p><input type="checkbox"/> Concur <input checked="" type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>As the Department's use of force, subject matter expert(s), the FTFO unit handles this responsibility.</p> <p>DGO 5.01 addresses this. <i>"The Training Division shall ensure that use of force data collected by the Technology Division from sources including Use of Force reports, Use of Force supervisory evaluations, and Drawing and Exhibiting supervisory evaluations shall be systematically reviewed, examined, and assessed in order to identify and address training needs and efficacy."</i></p>
<p>10. The San Francisco Police Department should establish procedures within its use-of-force evaluation process for supervisors to consider and document recommendations regarding training, equipment, or policy.</p>	<p><input type="checkbox"/> Concur <input checked="" type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>Supervisors do have a mechanism to escalate potential training, equipment, and policy issues. They may contact the Field Tactics Force Options Unit for training and equipment concerns, and the Policy Development Unit for policy-related issues. Communication may be made by phone, email, or in person at any of the numerous force options training that FTFO provides.</p> <p>Bureau Order 21-01 (Training Division Refresher Course following OIS and other Serious Incidents) requires members attend refresher training with FTFO after an OIS and/or other serious incident.</p>

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<p>11. Formalize procedures for reporting incidents to the California Department of Justice and incorporate them into Department General Order 5.01 or another applicable written directive.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>The Risk Management Office and the Business Analysis Team collaborate and report relevant incidents to the California Department of Justice in compliance with the California Government Code.</p> <p>We are currently reviewing SFPD Policy (and policies from outside agencies) as well as internal procedures to determine if, and to what extent, our current policies and procedures meet the express language and legislative intent of the code sections you provided (12525.2 and 7286). It should be noted that we have and continue to comply with State Law with regards to the transmission of data as required. We have prioritized this review and action, if warranted.</p>
<p>12. Formally determine whether use-of-force audits required by EIS Unit Orders 21-01 and 20-01 remain necessary. If the audits remain necessary, SFPD should ensure they are appropriately assigned and performed as required. If the department determines that the audits are no longer necessary, it should formally retire those requirements. If SFPD determines that other use-of-force audits would better support internal accountability, it should establish and perform them accordingly.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>EIS Unit Order 20-01 Use of Force Statement Audit Procedure has been rescinded. Unit Order 21-01 is still in effect.</p>
<p>13. Clarify the Risk Management Office's responsibility for reporting use-of-force statistics. If statistical reports from the Risk Management Office are necessary, the department should ensure they are produced and retained.</p>	<p><input type="checkbox"/> Concur <input checked="" type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>We do not concur because this was already implemented during the investigative phase of this audit.</p> <p>RMO reports use of force statistics to the Chief of Police on a bi-weekly basis. Additionally, monthly reports are posted on the SFPD department's website.</p>

<p>14. Formally assess the continued need for the use-of-force log. If the department determines that the log does not serve a distinct function, it should remove the requirement from DGO 5.01. If the department determines that the log remains necessary, it should clearly define its purpose and establish how the information supports oversight or analysis, separate from the Supervisory Use of Force Evaluation Form.</p>	<p><input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur</p> <p>The SFPD recognizes that there is redundancy within the Use of Force Log. However, there are operational reasons to retain it at this time. We will continue to evaluate its necessity.</p>
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Appendix E – DPA Evaluation of SFPD’s Responses

This section addresses SFPD’s response to the audit. The letters in the table below correspond to the annotations in the margins of SFPD’s responses in Appendices C and D.

Letter	DPA Evaluation
	SFPD states that DGO 5.01 is complete and consistent with legal standards, including California law and applicable case law, and that there are no gaps that hinder effective implementation or oversight. This audit evaluated the effectiveness of SFPD’s processes for monitoring use-of-force incidents. DPA identified opportunities for SFPD to strengthen oversight, as described in the report’s findings.
A	SFPD’s response states that DGO 5.01 closely resembles California Penal Code Section 835a. It also states that supervisors are trained to assess whether the use of force was reasonable, necessary, and proportional, applying their professional judgment and experience rather than following a rigid written protocol.
	In Penal Code Section 835a, the California State Legislature finds and declares that a peace officer’s decision to use force “shall be evaluated carefully and thoroughly...in order to ensure that officers use force consistent with law and agency policies.” ⁴⁴ This report does not recommend replacing supervisory judgment; instead, it recommends actions to help SFPD demonstrate that use-of-force evaluations are consistent, thorough, and objective.
B	SFPD’s response references the earlier draft title for Finding 2.3. In response to the draft report, SFPD stated that supervisors may raise policy-related issues through its Policy Development Unit. After reviewing that additional information, DPA revised the report to clarify that Finding 2.3 and Recommendation 10 address procedures within the supervisory use-of-force evaluation process described in DGO 5.01.
C	Finding 1.1 and Recommendation 1 reflect conditions DPA observed during the audit period (May 2024 to March 2025). DPA did not evaluate the changes SFPD made to the Supervisory Use of Force Evaluation Form (SUOFE) after March 2025.
D	SFPD did not concur with Recommendation 2, stating that the reasonableness of a use of force incident is based upon the totality of circumstances, and citing training, internal oversight, and resources available to supervisors. However, Recommendation 2 is for SFPD to ensure that the SUOFE captures the basis for policy-compliance determinations.

⁴⁴ California Penal Code, Section 835(a)(3).

SFPD's response also cites oversight by DPA, SFPD's Internal Affairs Division, and the Serious Incident Review Board. While such reviews may occur for certain incidents, Recommendation 2 concerns documentation within the supervisory evaluation required by DGO 5.01.⁴⁵

Finding 1.2 noted that a prior version of the form required supervisors to sequence subject resistance and force used. The report clarifies that Cal DOJ reported that sequencing in the SUOFE, coupled with DGO 5.01 guidance, enabled SFPD leadership up the chain of command to determine whether the use of force used was reasonable under the circumstances.

In its response letter, SFPD states that it no longer requires sequencing, and that the same information can be obtained through supervisors' review of body-worn camera footage and incident narratives or statements. Finding 1.2 does not evaluate the availability of body-worn camera footage or other records; instead, it provides examples illustrating how the department could add structure within the SUOFE to support supervisory determinations and subsequent review.

E In response to Recommendation 3, SFPD states that the captain's role in the use-of-force evaluation workflow may be unnecessary. Finding 1.3 notes that SFPD's evaluation workflow requires lieutenant- and captain-level sign-offs, but that the department does not have policy requirements describing how these members should conduct their reviews, and that the SUOFE does not capture the basis for their approvals or returns.

SFPD states that it does not concur with the part of DPA's recommendation to ensure the SUOFE captures the substance of lieutenant and captain reviews, citing its response to Recommendation 1. However, Recommendation 1 concerns evidence that supervisors completed responsibilities required by DGO 5.01.

In response to Recommendations 4 and 5, SFPD reports that it issued a department-wide email in November 2025 stating that supervisors directly involved in an incident may not complete, review, or approve the evaluation at any point in the workflow.

F Recommendation 5 called for SFPD to revise DGO 5.01 or issue a department notice to clarify whether a supervisor involved in a use-of-force incident may serve as a later-stage reviewer or whether a supervisor may perform more than one approval role within the same evaluation. SFPD's email instruction is broader than what is in DGO 5.01; however, SFPD does not recognize emails as written directives.

G SFPD did not concur with Recommendation 9, citing the Field Tactics Force Options Unit (FTFO) as the department's use-of-force subject matter experts and restating requirements for the Training Division found in DGO 5.01.

⁴⁵ As described in Appendix B, DPA sustained two allegations of unnecessary force in incidents where supervisors recorded "within policy" determinations.

Finding 2.2 notes that SFPD told Cal DOJ that FTFO is tasked with both specific and generalized reviews, but that FTFO's reference guide does not provide procedures for how to analyze aggregate use-of-force data. DGO 5.01 does not designate the specific unit responsible for data analysis or provide unit-level procedures.

SFPD did not concur with Recommendation 10. It states that supervisors have mechanisms to escalate potential training, equipment, and policy issues by contacting FTFO or the Policy Development Unit by phone, email, or in person, and that any supervisor can request FTFO to analyze a use-of-force incident. SFPD also cites refresher training requirements following officer-involved shootings and other serious incidents.

FTFO's reference guide states that reviews are intended to provide analysis to ensure that the department's field tactics and force options training is relevant, practical, consistent, and sound. Neither DGO 5.01 nor the SUOFE reference that members can request an informal review from the unit. Finding 2.3 now acknowledges that SFPD provides formal

- H** procedures for members to initiate or amend a written directive, but notes that this is separate from the use-of-force evaluation process outlined in DGO 5.01.

Chief of Staff Bureau Order 21-01 addresses refresher training following officer-involved shootings and serious incidents. As described in the order, the refresher course is not an incident tactical debrief and does not involve discussion of specific member actions. The refresher course is for department members who have been identified as "primary involved" or "substantially involved" in an incident. Bureau Order 21-01 provides procedures for FTFO to recommend training for a member or the member's commanding officer, but it does not provide requirements for supervisors to consider, document, and route training, equipment, or policy recommendations.

- I** Finding 3.2 and Recommendation 13 reflect conditions DPA observed during the audit period (May 2024 to March 2025). DPA did not evaluate reporting practices implemented by SFPD after March 2025.