



**Office of Inspector General
County of Los Angeles**

**Max Huntsman
Inspector General**

**Los Angeles County Sheriff's Department's
De-Escalation and Verbal Resolution
Training**

January 2018

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Introduction

The Los Angeles County Civilian Oversight Commission (COC) was directed by the Board of Supervisors (BOS) to “recommend potential improvements to the current co-response team deployment models that might more successfully achieve the program’s mission of de-escalating violent confrontations between deputies and persons with mental illness.”¹ The Commission released its preliminary report, “Status Report of the Sheriff Civilian Oversight Commission Regarding the Mental Evaluation Team Program of the Los Angeles County Sheriff Department,” on August 24, 2017.

From August 1, 2016, to August 4, 2016, members of the Office of Inspector General (OIG) evaluated the Los Angeles County Sheriff’s Department’s De-Escalation and Verbal Resolution Training (DeVRT), which is mentioned in the Commission’s report. The objective of the DeVRT training is to provide deputies assigned inside the Los Angeles County jail system with the skills and the knowledge that would effectively help them in working with mentally ill and difficult inmates.

On January, 18, 2012, a federal class action lawsuit entitled *Alex Rosas, et al. v. Leroy D. Baca*² (*Rosas*) was filed against former Los Angeles County Sheriff Leroy Baca. The lawsuit alleged that Sheriff Baca and the LASD staff failed to stop a pattern of violence by deputies against prisoners incarcerated in the Los Angeles County jail facilities. As part of the *Rosas* settlement, the Court appointed Mr. Richard Drooyan, Mr. Jeffrey Schwartz, and Mr. Robert Houston (the Panel) to develop a corrective action plan (Implementation Plan) and monitor and advise the court on the Department’s compliance with the plan.³ The Department was mandated to “provide a minimum of thirty two (32) hours of Custody-specific, scenario-based, skill development training to all Deputy Sheriff’s assigned to the Men’s Central Jail (MCJ), the Twin Towers Correctional Facility (TTCF) or the Inmate Reception Center (IRC), or those who are assigned to work with mentally ill inmates at the Century Regional Detention Facility (CRDF) on Crisis Intervention and Conflict Resolution with eight (8) hours of refresher training every other year.”⁴ As a result, the Department developed the DeVRT for department personnel who work with prisoners within the Los Angeles County jail system.

¹ This is known as the Mental Evaluation Team program (MET) and the BOS motion was passed on January 10, 2017

² *Alex Rosas, et al. v. Leroy D. Baca*, Case No. CV 12-00428 DDP.

³ *Alex Rosas, et al. v. Leroy D. Baca*, Case No. CV 12-00428 DDP, Settlement Agreement and Release of Claims, p. 2.

⁴ *Alex Rosas, et al. v. Leroy D. Baca*, Case No. CV 12-00428 DDP, Settlement Agreement Implementation Plan, p. 5.

On August 3, 2015, the Department offered its first DeVRT training course. This type of training is the first of its kind for the Department. This report provides an overview of the DeVRT training program and recommendations to the Department to ensure continued success with the program.

Compliance with *Rosas* Implementation Plan

As of November 30, 2017, approximately three thousand one hundred and twelve (3,112) LASD personnel have received DeVRT training. The *Rosas* settlement agreement required that the Department provide DeVRT training to all deputies assigned to MCJ, TTCF, or IRC or who are assigned to work with mentally ill inmates at the CRDF. However, the settlement plan in the case of *United States of America v. County of Los Angeles and Los Angeles County Sheriff Jim McDonnell, in his Official Capacity*,⁵ DeVRT training is also required for deputies assigned to the North County Correctional Facility, the Pitchess Detention Center, and non-mental health housing units in CRDF. According to the Panel, “[d]epartment members have commented that they found the DeVRT training to be very valuable and have used what they learned in the training to avoid having to use force in potentially problematic situations”.⁶ The Department anticipates completing training of all personnel required by both settlement agreements no later than July 1, 2019. The Department will continue to provide DeVRT training to newly graduated deputies and custody assistants indefinitely.

Identifying Best Practices for Custody Personnel

Prior to developing the DeVRT course, the Department conducted research and review of similar training programs taught by San Diego County, Orange County, the Salt Lake City Police Department, the Memphis Police Department (MPD), and the National Institute of Corrections (NIC). The Department eventually focused on two programs that they believed would be the best fit for the Department - MPD’s training program, referred to as the “Memphis Model” and the program being taught by the NIC, referred to as the “NIC Model.” The Panel strongly recommended that crisis interviewing be included as a learning module in DeVRT, therefore, the Department included the topic in the DeVRT curriculum. DeVRT staff describe DeVRT as a hybrid of the Memphis Model and the NIC Model with the addition of a crisis interviewing module.

⁵ *United States of America v. County of Los Angeles and Los Angeles County Sheriff Jim McDonnell, in his Official Capacity*, Case No. 15-cv-05903 DDP.

⁶ *United States of America v. County of Los Angeles and Los Angeles County Sheriff Jim McDonnell, in his Official Capacity*, Case No. 15-cv-05903 DDP, Panel’s Second Report.

The Memphis Model

After the shooting of a mentally ill person by MPD in 1988, MPD joined in partnership with the Memphis Chapter of the National Alliance on Mental Illness (NAMI), mental health providers, and two local universities (the University of Memphis and the University of Tennessee) to organize, train and implement a specialized unit for the purpose of developing a more intelligent, understandable, and safe approach to handling mental crisis events. This community effort was the genesis of the MPD's Crisis Intervention Team (MCIT).⁷

The MCIT program provides law enforcement-based Crisis Intervention Training (CIT) to help those individuals with mental illness. Involvement in this model of CIT is voluntary and based within the Patrol Division of the Police Department. Currently, the MPD has approximately 268 officers who have received CIT that maintain coverage 24 hours a day, 7 days a week.⁸

The NIC Model

In 2011, the NIC initiated a plan to train multidisciplinary leadership teams from around the country to develop and implement locally managed CIT programs within their home institutions.⁹ The NIC undertook a pilot program "designed to prepare three-person teams [representing the correctional, mental health, and consumer advocacy disciplines] to develop and implement CIT in their local jails and state prison systems."¹⁰

There are two significant differences between the NIC Model and DeVRT. The first is that the NIC Model remains strictly voluntary, no exceptions, and the second is that no new custody employees are eligible to attend an NIC class. The LASD requires all new custody deputies to attend DeVRT, as mandated by *Rosas*. Below is a chart reflecting the differences in the CIT models researched versus DeVRT.

⁷ "The Memphis Model", Memphis Police Department, Accessed August 9, 2017, <http://www.memphispolice.org/initiatives.asp>

⁸ "The Memphis Model", Memphis Police Department, Accessed August 9, 2017, <http://www.memphispolice.org/initiatives.asp>

⁹ "Training U.S. Correctional Officers in Mental Health Emergency Response Using the Memphis Crisis Intervention Team Model", Accessed February 21, 2017 <http://www.merage-equitas.org/wp-content/uploads/2014/06/Training-US-Correctional-Officers-in-Mental-Health-Response.pdf>, Pg. 3

¹⁰ "Training U.S. Correctional Officers in Mental Health Emergency Response Using the Memphis Crisis Intervention Team Model", Accessed February 21, 2017, <http://merage-equitas.org/wp-content/uploads/2014/06/Training-US-Correctional-Officers-in-Mental-Health-Response.pdf>, Pg. 3.

Table 1 – Comparison of Various Mental Health Training Models

	Memphis Model	NIC Model	DeVRT
Number of Course Hours	40	40	32
Voluntary Participation	Yes	Yes	No
Offered to New Employees	No	No	Yes
Periodic Refresher Training	No	No	Yes

Overview of DeVRT

DeVRT is jointly taught to deputies and custody assistants by sworn members of the Department and mental health professionals in a team-teaching approach.¹¹ Teaching techniques include role-playing exercises that focus on scenario-based training similar to situations faced daily in the custody setting.

DeVRT provides the students multiple opportunities to learn and apply these skills through scenario-based training/role-playing. Students both participate in the role-playing exercises and observe their peers' participation. The students are given immediate feedback from the instructors and two psychologists so they are corrected or commended instantly. According to Department personnel, the "immediate feedback" is what distinguishes this course from many other similar types of training.

In addition to role-playing, the LASD also utilizes a use-of-force simulator system as a teaching tool. This simulator, referred to as Multiple Interactive Learning Objectives (MILO) system, is an interactive use-of-force training system that provides different scenarios to train students on situations that they may encounter in a custody setting. The DeVRT training staff created several interactive video scenarios that provide the students various options to best complete the scenario effectively.

DeVRT Session #41

From August 1, 2016, to August 4, 2016, staff from the Office of Inspector General (OIG) attended DeVRT training Class #41. The DeVRT course examines core concepts that emphasize effectively working with inmates with mental illness and disabilities and in situations within the correctional environment where the use of de-escalation techniques and communication strategies could lead to a decrease in the use of force. The attached schedule (Attachment 1) illustrates the current curriculum and course topics. This is not a pass/fail course. Throughout the course, open discussion by students is encouraged after each section of instruction or

¹¹ Custody Assistants are non-sworn personnel that assist sworn personnel in maintaining order and security in Los Angeles County jail facilities.

scenario based role playing. The instructors focus on giving students open and ongoing feedback about their performance throughout the course.

Throughout the course, instructors repeatedly emphasized that students should “focus on the skills, not the scenario” and students should be “humane and compassionate.” The significance of the DeVRT program is the teaching methods used by the staff, such as giving immediate coaching and feedback to students during and after the role playing scenarios.

NAMI provided two guest speakers who shared personal stories describing the reality of living with mental illness. The first guest speaker was an individual suffering from mental illness. The second guest speaker was a family member of an individual suffering from mental illness. The first guest speaker discussed her mental illness and what strategies worked with her to “deescalate” a certain situation she was involved in with law enforcement. We found the NAMI speakers to be very worthwhile contributors to the DeVRT curriculum.

Various training aids were developed by the DeVRT creators to provide instructors with insight into the training, such as a pre-test, a post-test, course evaluations to be completed by students each day, and scenario based testing. DeVRT staff stated that while they review the various training aids at the end of each class, they do not currently conduct any formal analysis or compile data to measure student feedback and instructor performance. The Department reports that they did formally compile and analyze data by instructor as well as topic for DeVRT for the period of August 2015 through September 2016; however, they suspended conducting such analysis because it was labor intensive and did not reveal any significant variances across the data.

DeVRT Course Evaluations

We reviewed post-tests and course evaluations for DeVRT Class #39 and Class #41. DeVRT Class #39 was conducted between July 18, 2016, and July 21, 2016, and was attended by thirty-eight newly appointed deputy sheriffs.¹² DeVRT Class #41 was conducted between August 1, 2016, and August 4, 2016, and was attended by thirty-two deputy sheriffs with experience ranging from three to twenty-six years with the Department. We compared the feedback from the newly appointed deputies to that of the experienced deputies.

The pre-test and post-test for the course consists of twenty-two multiple-choice questions pertaining to effective ways of interacting with individuals with mental illness, de-escalation strategies, and other core concepts of the training. OIG staff

¹² These newly appointed deputy sheriffs had not yet reported for duty at their assigned custody facilities or had less than one year of experience.

reviewed the post-tests completed by students for both classes and determined the students performed well. The total possible maximum score for the post-test was 22. The average post-test score for Class #39 was 21.47 and Class #41 was 21.56.

At the conclusion of each topical presentation students complete evaluations for each instructor, rating them on several dimensions (i.e., clearly stated objectives, knowledgeable on topic, presentation was understandable, delivery was well organized, participation was encouraged, and training aids were helpful). At the end of the training course, students completed an overall final evaluation of the course. OIG staff reviewed final course evaluations completed by students for Class #39 and Class #41. OIG staff noted that the majority of the students gave positive feedback on the course. The following tables show the final course evaluation questions and an overview of the students’ feedback for DeVRT Class #39 (Table 2) and Class #41 (Table 3).

Table 2 – DeVRT Class #39 Final Course Evaluation Summary

	Question	Strongly Agree	Agree	Disagree	Strongly Disagree	Did not answer
1	The content of the class was what I expected	54.1%	43.2%	2.7%	0.0%	0.0%
2	The content of this class was relevant to my job	81.1%	18.9%	0.0%	0.0%	0.0%
3	This training program will help me do my job better	81.1%	18.9%	0.0%	0.0%	0.0%
4	This training program was well organized	78.4%	21.6%	0.0%	0.0%	0.0%
5	This training program has increased my knowledge in this content area	83.8%	16.2%	0.0%	0.0%	0.0%
6	I will apply what I have learned back on my job	81.1%	18.9%	0.0%	0.0%	0.0%

Table 3 - DeVRT Class #41 Final Course Evaluation Summary

	Question	Strongly Agree	Agree	Disagree	Strongly Disagree	Did not answer
1	The content of the class was what I expected	25.9%	51.9%	3.7%	11.1%	7.4%
2	The content of this class was relevant to my job	22.2%	55.6%	3.7%	11.1%	7.4%
3	This training program will help me do my job better	63.0%	29.6%	3.7%	3.7%	0.0%
4	This training program was well organized	70.4%	29.6%	0.0%	0.0%	0.0%
5	This training program has increased my knowledge in this content area	66.7%	33.3%	0.0%	0.0%	0.0%
6	I will apply what I have learned back on my job	59.3%	33.3%	3.7%	3.7%	0.0%

Instructors conduct scenario-based testing during role playing exercises and the interactive computer generated training (Milo Simulator) portions of the class. During scenario-based testing, DeVRT instructors evaluated whether or not a student was successful in meeting the following seven objectives.

- 1) Introduction – The student introduces self and asks the name of the inmate.
- 2) Rapport – The student demonstrates active listening skills. The student provides a sense of safety, comfort, and understanding. The student indicates their intent to help, empathizes with the inmate, shows interest, and is patient and respectful.
- 3) Vocal Pattern – The student maintains a calm, patient tone and pace throughout the interaction with the inmate.
- 4) Non-verbal (Demeanor/Movement) – The student maintains a safe yet engaged distance, open posture, hands are calm/non-threatening, appropriate eye contact, appropriate facial expressions, and use of command presence.
- 5) Slow Down Pace – The student uses time, rapport, vocal pattern, and non-verbal techniques in a manner that promotes de-escalation.
- 6) Problem Solving – The student’s action plan fits the problem. The student uses available resources, when applicable. The student provides appropriate options.
- 7) Tactics/Safety – The student demonstrates appropriate officer safety, such as, maintaining safe distance, simulated search method, bladed stance, hands are ready but relaxed, asks about objects, and uses their partner when appropriate.

Each student had five to seven minutes to complete a scenario. If a student was not adequately progressing, the instructors called a "time out" and coached the student on how to proceed with the scenario. After students completed each scenario, the instructors de-briefed each student and provided constructive feedback. During our observation of Class #41, we observed student participation in role playing exercises and interactive computer generated training using the Milo system. OIG staff also observed instructors conducting scenario based testing. During our observation, we noted that students were engaged with the instructors and appeared to be receptive to coaching and feedback during de-briefing.

Performance Measures

The Department stated that DeVRT is currently evaluated on an informal basis by the DeVRT training staff. Students complete a pre-test on the first day of class which is collected and put aside until the final day of class when the pre-tests are used by the instructors to facilitate group discussion with the students. The pre-tests and post-tests are gathered and reviewed by the DeVRT training staff and are ultimately filed with the Custody Training and Standards Bureau.

In May of 2016, Custody Division Manual (CDM), Section 7-01/010.05, Reporting Prevented Uses of Force, was implemented to capture the effectiveness of DeVRT. This policy states "A prevented use of force occurs any time personnel are able to employ effective de-escalation techniques in order to gain compliance from uncooperative or combative inmates. If custody personnel have successfully de-escalated an incident they shall notify a supervisor (supervising line deputy or above). In cases where the supervisor can confirm or has witnessed a prevented use of force, the supervisor shall document the incident with an entry in the Electronic Line Operations Tracking System (e-LOTS). The entry shall be made prior to the end of the shift from which the incident occurred." All custody facilities are required to utilize e-LOTS system to track their use-of-force packages and alleged use-of-force investigations.

OIG staff reviewed the Custody Division Manual to determine if a "prevented use of force" is defined. We noted that CDM Section 7-08/030.00, Electronic Immobilization Device Procedures, states "[i]f the supervisor determines that verbal warnings or the displaying of the electrical arc resulted in a prevented use of force, this shall be documented per CDM section 7-01/010.05, Reporting Prevented Uses of Force." No other definition or examples of a prevented use-of-force is in the CDM.

The Department reports that, in order to track short and long term impact of the DeVRT training, it is revising the Supervisor's Report on Use of Force form (LASD Form SH-R-438P) to include a check box to document whether or not employees

involved in a use-of-force have attended DeVRT. Additionally, the Department stated that a reduction in the number of civil lawsuits filed against the LASD alleging force at MCJ is anticipated. According to the Department, this will be another benchmark used to determine the effectiveness of DeVRT.

Past research and studies have been conducted to validate the effectiveness of both the Memphis and NIC models. Due to the various factors involved with the *hybrid* approach of CIT, revised measures are required to ensure the DeVRT model is as, or more, effective as the others. According to research by Robert O. Brinkerhoff, just 15% of what is learned during training will be applied on the job if it is not reinforced and monitored.¹³

Cost Associated with DeVRT Training

According to Custody Training and Standards Bureau staff, the cost to cover backfill overtime¹⁴ per attendee of the DeVRT training course is as follows.

- Bonus Deputy Sheriff¹⁵ - \$2,545.92
- Deputy Sheriff¹⁶ - \$2,341.12
- Custody Assistant¹⁷ - \$1,506.24

The DeVRT Program currently has five permanent staff members (one lieutenant, one sergeant, two bonus deputies, and one operations assistant I¹⁸). Additionally, the DeVRT Program also has four sergeants who are on loan from other custody units and two licensed clinical psychologists on loan from the Department's Psychological Services Bureau. According to the Department, the total cost for the DeVRT program to date is approximately \$7.3 million.

Conclusion

Throughout this review, Department personnel have remained open and responsive to our inquiries. They shared available data with us and compiled data in response

¹³ "Creating a Post Training Evaluation Plan", accessed November 21, 2016
<http://www.kirkpatrickpartners.com/Portals/0/Resources/Articles/Creating%20a%20Post-Training%20Evaluation%20Plan%20T%20D%20June%202013.pdf>

¹⁴ Overtime to backfill the regular post of an employee while they are attending training.

¹⁵ Within the Deputy Sheriff classification there are designated Bonus level positions. These specialized positions are recognized as positions that require certain skills and/or expertise.

¹⁶ Deputy Sheriffs are the main work force from the sworn category and are responsible for performing a wide variety of law enforcement functions.

¹⁷ Custody Assistants are non-sworn personnel that assist sworn personnel in maintaining order and security in Los Angeles County jail facilities.

¹⁸ The Operations Assistant I is a non-sworn department member assigned to the DeVRT program to assist with administrative tasks.

to our requests in a timely manner. Their cooperation was essential to gathering information necessary to complete our review and is greatly appreciated.

From the OIG's observation in the classroom, custody staff appear to be receptive to the DeVRT training. The key action item for the Department is to validate the indicators used in determining the reduction in force as a result of the training.

The Department's current policy regarding prevented uses of force is too subjective. The policy leaves room for interpretation which may result in inconsistent reporting and unreliable data.

Overall, the DeVRT program is providing custody personnel with new and enhanced skills to de-escalate a mental health crisis or other critical incidents during the course of their day-to-day duties.

Recommendations

1. The Department should identify meaningful performance measures to evaluate the effectiveness of the DeVRT training. We suggest using the National Institute of Corrections (NIC) model of measuring performance that establishes goals, objectives and key indicators of outputs and outcomes using the scorecard method.¹⁹ The NIC model of performance measures provides a sound basis for measuring performance in other custodial settings where similar types of programs have been initiated.
2. The Department should consider revising CDM section 7-01/010.05, Reporting Prevented Uses of Force, to more clearly define what constitutes a "prevented use of force." Additionally, the Department should consider including training regarding the Prevented Use of Force policy and procedures in the DeVRT course.
3. In order to track the impact of the DeVRT training the Department should revise LASD Form SH-R-438P, Supervisor's Report on Use of Force, to include a check box to document whether or not employees involved in a use-of-force have attended DeVRT.
4. The LASD Audits and Accountability Bureau (AAB) should conduct random audits of the DeVRT and its performance measurements, once established, to determine if the de-escalation policy is being followed consistently with effective outcomes.

¹⁹ "The Evidence-Based Decision Making (EBDM) in Local Criminal Justice Systems Starter Kit: 6a: Measuring Your Performance", National Institute of Corrections, accessed November 21, 2016, <https://info.nicic.gov/ebdm/?q=node/77>

Department's Response

See the attached letter from the Department dated December 27, 2017.



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

JIM McDONNELL, SHERIFF



December 27, 2017

Max Huntsman, Inspector General
Los Angeles County Office of Inspector General
312 South Hill Street, 3rd Floor
Los Angeles, California 90013

Dear Mr. Huntsman:

**RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF INSPECTOR
GENERAL REPORT – THE DEPARTMENT’S DE-ESCALATION AND VERBAL
RESOLUTION TRAINING (DeVRT) PROGRAM**

Attached is the Los Angeles County Sheriff’s Department’s (Department) response to the Los Angeles County Office of Inspector General’s (OIG) final report entitled, “The Department’s De-escalation and Verbal Resolution Training (DeVRT) Program.”

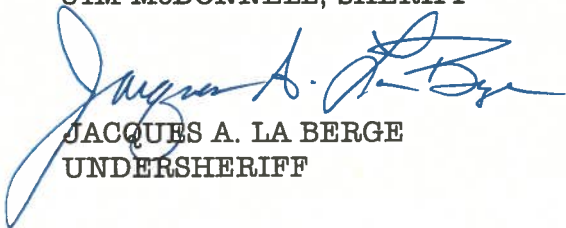
We thank you and your staff for your efforts in providing an overview of the DeVRT training program and recommendations to the Department to ensure continued success with the program.

The effort and dedication made by members of the OIG to execute this report are greatly appreciated by the Department. The Department will continually strive to meet and/or exceed the recommendations of this report.

The Audit and Accountability Bureau has the responsibility to monitor and document the Department’s response related to this evaluation. Should you have any questions regarding the Department’s response, please contact Captain Steven E. Gross at (323) 307-8302.

Sincerely,

JIM McDONNELL, SHERIFF



JACQUES A. LA BERGE
UNDERSHERIFF

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

RESPONSE TO THE LOS ANGELES COUNTY OFFICE OF
INSPECTOR GENERAL REPORT

COUNTY OF LOS ANGELES – SHERIFF

SUBJECT: OFFICE OF INSPECTOR GENERAL'S (OIG) REPORT ON THE
DEPARTMENT'S DE-ESCALATION AND VERBAL RESOLUTION TRAINING (DeVRT)
PROGRAM

RESPONSE TO RECOMMENDATIONS BY THE OIG

1. The Department should identify meaningful performance measures to evaluate the effectiveness of DeVRT training.

Response: Concur. The Department will create a strategic working group who will identify meaningful performance measures and develop a plan for successful implementation of this recommendation. A proposed time frame to carry out the required actions for completion will be addressed once the working group has developed a plan to implement this comprehensive task.

2. The Department should consider revising CDM section 7-01/010.05, Reporting Prevented Uses of Force, to more clearly define what constitutes a "prevented use of force."

Response: Concur in part. The portion of the OIG report addressing this matter indicates that CDM Section 7-01/010.05, Reporting Prevented Uses of Force, was implemented to capture the effectiveness of DeVRT. However, this CDM section was created by Custody Support Services to streamline and officially document a process that was already in place years prior. The statistical information gathered prior to the CDM section being implemented varied from custody facility to custody facility. As such, de-escalation skills preventing a reported use of force were being used every day without being uniformly documented, making it difficult to compare prevented uses of force versus actual uses of force. This CDM section was neither created nor intended to specifically capture the "effectiveness" of DeVRT.

With that being said, the Department has found it more challenging than expected to uniformly report instances of successful de-escalation. Personnel so commonly employ de-escalation techniques during a given work shift, ranging from the most simple of actions to more substantive and intricately planned ones, that it becomes difficult to quantify and then report on each individual instance. Additionally, CDM 7-01/010.05, essentially requires (at potential penalty of discipline) reporting on a counterfactual, or the absence of information – it may be impossible to know with any measure of certainty whether there would have been a Use of Force but for a particular de-escalation effort. Knowing whether the de-escalation truly "prevented" a Use of Force, and should therefore be quantified and reported on, is inherently speculative; it is also, therefore, hard to do with any uniformity from employee to employee, facility to facility, etc.

We agree with the OIG's recommendation insofar as it calls on us to revisit CDM 7-01/010.05. The intention behind the policy remains a valuable and important one. However, after having the policy in place for some time, the Department feels it is most prudent to first determine whether clear definitions of uniformly quantifiable and reportable de-escalation efforts are indeed possible, and whether the tracking of such efforts is best addressed by a CDM policy (at potential penalty of discipline), or by a different mechanism altogether. The Department will create a strategic working group to revisit this policy.

3. In order to track the impact of DeVRT training the Department should revise the LASD Form SH-R-438P, Supervisor's Report on Use of Force, to include a check box to document whether or not employees involved in a use of force have attended DeVRT training.

Response: Concur. With regard to Custody Operations, a checkbox documenting whether employees involved in a Use of Force have attended DeVRT is already included in LASD Form SH-R-438P, and is already implemented and in practice. As of June 14, 2017, custody supervisors are required to complete Form SH-R-438P online, which is where this data is collected and captured. It is noted that the paper printout of the online form does not display the data that was entered online in the checkbox for DeVRT training (there are some other data fields collected online that also do not appear on the paper printouts); it is further noted, however, that the DeVRT checkbox online may diminish in value as the Department continues its DeVRT program for all newly-graduated deputies and custody assistants indefinitely.

4. The LASD Audits and Accountability Bureau (AAB) should conduct random audits of the DeVRT program and its performance measurements, once established, to determine if the de-escalation policy is being followed consistently with effective outcomes.

Response: Concur. The AAB will be able to conduct audits once performance measurements are established for the DeVRT program.