Follow-Up on the Early Intervention System Audit

The King County Sheriff's Office has made progress on four recommendations to improve the effectiveness of the Early Intervention System, but key decisions on indicators and alert timeframes used are contingent on labor cooperation and have not yet been implemented. The King County Sheriff's Office (KCSO) has proposed using a new Early Intervention System (EIS) software (EIPro) to address several of the audit recommendations made in January 2017. As of June 2020, KCSO representatives report that the Sheriff has expressed support for EIPro, but KCSO has not yet purchased it. KCSO representatives state that EIPro will not be purchased until King County Information Technology has adequate time to prepare for its implementation and KCSO has determined the appropriate level of system access for employees across roles. KCSO representatives also indicate that KCSO must agree with its labor partners on the indicators to be used in the system before it is implemented.

Some reported EIPro features would help fulfill the EIS audit recommendations, such as the ability to identify outliers in behavior within work groups or to increase system access for supervisors. EIPro does not, however, directly address our recommendations to lengthen the EIS alert window, to change indicators, or to reevaluate the EIS algorithm. The language pertaining to the 90-day alert window in the King County Police Officers Guild labor contract—a key barrier identified at the time of the audit—was not addressed or updated in the King County Police Officers Guild contract that was finalized in March 2020.

Implementation of the proposed software and the remaining recommendations would increase opportunities to improve officer performance, wellness, accountability, and risk management. If properly used, an EIS can help an agency address problematic officer behaviors before they lead to serious consequences for the officer or the public. By effectively implementing EIS software and addressing the remaining audit recommendations, KCSO would help ensure its EIS produces alerts that are useful and data that can be used to continually improve agency practices.

Of the nine audit recommendations:

0 DONE	4 PROGRESS	5 OPEN
Fully implemented Auditor will no longer monitor.	**Partially implemented** Auditor will continue to monitor.	**Remain unresolved** Auditor will continue to monitor.

Please see below for details on the implementation status of these recommendations.

Recommendation 1   OPEN ⊙

The King County Sheriff's Office should increase the Early Intervention System alert window as previously recommended in 2012.

STATUS UPDATE: The language pertaining to the 90-day alert window in the King County Police Officers Guild labor contract was not addressed or updated in the King County Police Officers Guild contract that was finalized in March 2020. KCSO representatives state that features included in the new proposed EIS software (EIPro) will make a longer alert window unnecessary because the software will make it easier to compare the activity of officers with peers in the same work group. At the time of the audit, however, experts placed a strong emphasis on the importance of a longer alert timeframe to detect the subtle patterns of behavior intended to be addressed by an EIS. Given the early stages of KCSO's effort to acquire EIPro, it is unclear whether its implementation will address this concern.

WHAT REMAINS: To complete this recommendation, KCSO needs to expand the 90-day alert window to allow its EIS to include a longer period of data. By implementing this recommendation KCSO can significantly improve the quality of EIS alerts and make the implementation of other recommendations relating to the EIS algorithm more effective. This recommendation is critical to the success of the EIS, and failure to implement it could significantly limit the effectiveness of other recommendations. A well-functioning EIS can be a key tool to identify concerning employee behaviors early on, before they result in serious consequences for the officer and the public. Without addressing key shortcomings such as this, however, the EIS is unlikely to effectively do this. This recommendation can be closed only if an alternative approach is proven to address concerns that EIS alerts are merely flagging concerns that supervisors are already aware of due to the recency of the related incidents under a 90-day timeframe.

Recommendation 2   PROGRESS ⋯

The King County Sheriff's Office should identify and regularly reevaluate additional indicators for the Early Intervention System.

STATUS UPDATE: KCSO staff have suggested additional indicators in internal memos and annual EIS reports, but none have been incorporated into the EIS as of June 2020. KCSO representatives state that features included in EIPro will make reviews of alert indicators less necessary because the software will make it easier to compare the activity of officers with peers in the same work group. They also note that separating out different kinds of uses of force as indicators may be useful and feasible.

WHAT REMAINS: To complete this recommendation, KCSO needs to incorporate additional indicators into the EIS and ensure that these indicators are entered correctly by staff. It also needs to evaluate whether the indicators it adds are effective. By implementing this recommendation, KCSO can improve the quality of EIS alerts and ensure that the indicators used will better allow it to identify concerning employee behavior early on. This recommendation could be closed if an alternative approach is proven to better address the concern that EIS alerts are flagging behaviors which represent appropriate activity or which are detected prior to the EIS identifying the concern.

Recommendation 3   OPEN ⊘

The King County Sheriff's Office should regularly reevaluate and refine alert algorithms for different indicators. These algorithms should take into account the differing frequency and severity of incidents.

STATUS UPDATE: KCSO did not report changes to alert algorithms used in the EIS as of June 2020. KCSO representatives state that features included in EIPro will eliminate the need to readjust the algorithm because the software will make it easier to compare the activity of officers with peers in the same work group. It is unclear to what extent the changes proposed through implementation of EIPro will fully address the need for useful alerts triggered through a well-designed algorithm (i.e. the number of incidents within a timeframe used to trigger an alert).

WHAT REMAINS: To complete this recommendation, KCSO needs to make changes to its alert algorithms in response to regular evaluations of the system. The algorithms that it uses should consider the fact that some incidents are more frequent or severe than others and may not merit the same thresholds. By implementing this recommendation, KCSO can improve the quality of EIS alerts. The EIS could then better identify concerning employee behaviors early on and reduce the frequency of EIS alerts that do not suggest a legitimate concern. This recommendation could be closed if an alternative approach is proven to better address the concern that EIS alerts are flagging behaviors which represent appropriate activity, or which are detected prior to the EIS identifying the concern.

Recommendation 4   PROGRESS ⋯

The King County Sheriff's Office should design the parameters of the Early Intervention System to consider specific working environments. The Sheriff's Office should evaluate these parameters on a regular basis.

STATUS UPDATE: KCSO has proposed the adoption of a new EIS software (EIPro) that would better allow the office to compare staff while considering specific work environments. The EIPro proposal indicates that the software can be used to identify outliers in specific behaviors within designated work groups. As of June 2020, KCSO representatives indicated that the Sheriff supports the new software, but the software has not yet been purchased. If the software is ultimately not purchased and an alternative method to address this recommendation is not implemented, this recommendation's status could be returned to open.

WHAT REMAINS: To complete this recommendation KCSO needs to ensure that working environments are systemically considered for alerts. This may be satisfied by implementing EIPro and demonstrating how the software has allowed KCSO to consider alerts relative to specific working environments. By implementing this recommendation, KCSO can improve the quality of EIS alerts to better identify concerning employee behaviors early on and reduce the number of alerts that do not suggest a legitimate concern.

Recommendation 5   PROGRESS ⬤⬤⬤

The King County Sheriff's Office should establish written procedures for Early Intervention System interventions. These should describe the kinds of interventions to use in particular circumstances, when to respond to alerts, and what level of detail to report in alert responses to human resources.

STATUS UPDATE: KCSO staff circulated an internal memo in December 2016 suggesting procedures that detail types of interventions, plus a standardized form to indicate required response content, but KCSO has reported no formal policy changes as of June 2020. At the time of the 2018 follow-up, KCSO reported that it wanted to delay formal procedure changes until completion of the most recent King County Police Officers Guild contract. The new contract was submitted in February 2020. The draft procedures did not include an explanation of the circumstances in which different kinds of interventions may be considered. KCSO representatives state that managers have been held to the requirements outlined in the draft policy. KCSO representatives state that the policy will be finalized following the purchase of EIPro to ensure compatibility.

WHAT REMAINS: To complete this recommendation, KCSO needs to establish official written procedures for responding to EIS alerts. These should describe potential interventions to use under different circumstances, articulate a timeline for alert responses, and clearly explain details that must be included in all alert responses. By implementing this recommendation, KCSO can make EIS responses more consistent and better understand how EIS alerts are being used.

Recommendation 6   PROGRESS ⬤⬤⬤

The King County Sheriff's Office should actively involve direct supervisors in the handling of alerts. The level of involvement should be documented in written procedures.

STATUS UPDATE: KCSO staff circulated an internal memo in December 2016 suggesting procedures which require an employee's direct supervisor to be involved in alert assessments. KCSO has reported no policy changes as of June 2020. At the time of the 2018 follow-up, KCSO reported that it wanted to delay formal procedure changes until completion of the most recent King County Police Officers Guild contract. The new contract was submitted in February 2020. The EIPro proposal notes that the software allows supervisors to view the employees under their purview, which would facilitate this process.

WHAT REMAINS: To complete this recommendation KCSO needs to document and implement official procedures explaining that direct supervisors should be directly involved when considering alerts. To the extent to which EIPro facilitates this process, implementation of EIPro will also help complete this recommendation. By completing this recommendation, KCSO can ensure that alert responses receive the input of supervisors who work most closely with the employee, which can help KCSO better tailor actions it takes to address employee needs.

Recommendation 7   OPEN ⊘

The King County Sheriff's Office should evaluate the Early Intervention System and develop a continuous improvement plan.

STATUS UPDATE: In the course of this follow-up, KCSO representatives proposed that KCSO would conduct a yearly review of the EIS, with assessment being conducted in collaboration with labor groups. This process would not begin until EIPro is implemented.

WHAT REMAINS: To complete this recommendation, KCSO needs to conduct an evaluation of its EIS that identifies clear changes to the system and develop a plan for continuous improvement. By implementing this recommendation, KCSO can ensure that changes made to the EIS are effective, and that the EIS is meeting potentially changing needs.

Recommendation 8   OPEN ⊘

The King County Sheriff's Office should determine the data necessary to evaluate the Early Intervention System's effectiveness, and ensure that this data is available for future analysis. This should include clear data on when alerts occur, when and if a commanding officer intervened in response to the alert, and how the commanding officer intervened.

STATUS UPDATE: Annual EIS reports written by KCSO state that KCSO has worked with managers to provide justifications when actions are not taken in response to EIS alerts, and to provide documentation of actions that are taken. KCSO has not explicitly identified the data necessary to evaluate the EIS as of June 2020.

WHAT REMAINS: To complete this recommendation, KCSO needs to determine and document the data it believes is necessary to evaluate the EIS' effectiveness and ensure that EIS policies and procedures facilitate the collection of this information. KCSO should be able to conclusively state when all alert responses occur, whether and when the EIS users took action in response to the alerts, and the actions the EIS users took in response to the alerts. By consciously considering the data necessary to evaluate EIS effectiveness, and ensuring that data is available for future analysis, KCSO can ensure that changes to the EIS are informed and make the system more effective.

Recommendation 9   OPEN ⊘

The King County Sheriff's Office (KCSO) should evaluate and respond to trends using data available through the Early Intervention System. KCSO should use this data to identify and take action on areas needing improvement.

STATUS UPDATE: While KCSO annually conducts a high-level evaluation of alert trends in the form of annual EIS reports, it has not evaluated and responded to other trends using information collected through the EIS software. KCSO staff state that EIPro, when implemented, will make trend analysis more feasible.

WHAT REMAINS: To complete this recommendation, KCSO needs to evaluate trends using data available through the EIS (such as use of force, vehicle accidents, etc.) to identify whether there

are particular areas for improvement by activity type or workgroup. If issues are identified, KCSO should create an action plan to address these issues. This evaluation could be demonstrated through a formal report, internal memo, or other documented evaluation. By using the data that is already available, KCSO can identify potential areas for improvement and better ensure that it is meeting agency goals and reducing risk.

Kayvon Zadeh conducted this review. If you have any questions or would like more information, please contact the King County Auditor's Office at KCAO@kingcounty.gov or 206-477-1033.