



KING COUNTY AUDITOR'S OFFICE

AUGUST 2, 2021




Follow-up on the Early Intervention System Audit

The King County Sheriff's Office has committed to purchasing a new Early Intervention System software which has the potential to improve supervisory review capabilities and the way the system considers specific work environments. The King County Sheriff's Office (KCSO) has proposed using a new Early Intervention System (EIS) software (EIPro) to address several audit findings at the time of both this and the 2020 follow-up reports. KCSO has committed to purchasing EIPro as of the time of this follow-up, however it has made limited progress toward implementing audit recommendations. As such, the implementation status of one recommendation KCSO has not made progress on since the time of the previous audit follow-up has been returned to "open" from "progress."

While KCSO may use EIPro as part of a strategy to address the audit recommendations, it is not required to, and implementing EIPro alone will also not address the audit recommendations. To complete the remaining recommendations, KCSO must implement and evaluate appropriate EIS procedures and alert parameters and use EIS data for trend analysis, regardless of what software it uses.

It is essential that KCSO continues to evaluate potential EIS parameters given that researchers have not yet identified the ideal EIS design. KCSO could increase opportunities to improve officer performance, wellness, and accountability by implementing the remaining recommendations in a way that considers the state of research on EIS. While research on the effectiveness of EIS is generally positive, law enforcement agencies have had mixed success with them. Existing research also does not definitively identify the most effective EIS alert indicators, algorithms, and other parameters. If KCSO hopes to use its EIS to improve officer performance, wellness, and accountability, it needs to continually refine the EIS in response to what it learns from its own experiences and new research. This audit's recommendations are intentionally open-ended to allow KCSO to respond to emerging research and to continue to improve the EIS.

Of the nine audit recommendations:

 <div>0 DONE</div>	 <div>2 PROGRESS</div>	 <div>7 OPEN</div>
Fully implemented Auditor will no longer monitor.	Partially implemented Auditor will continue to monitor.	Remain unresolved Auditor will continue to monitor.

Please see details below for implementation status of each recommendation.

Recommendation 1

OPEN



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

STATUS UPDATE: KCSO has neither increased the 90-day EIS alert window nor addressed language related to this in the King County Police Officers Guild labor contract, finalized in March 2020. KCSO states that going forward, it will not have the ability to negotiate for this change in future labor contracts due to the November 2020 passage of King County charter amendment 5, which returned the Sheriff to an appointed, rather than elected, position and moved all bargaining responsibilities to the County Executive.

WHAT REMAINS: To complete this recommendation, the County needs to expand the 90-day alert window to allow KCSO EIS to include a longer period of data. Implementing this recommendation may 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 has the potential to be an important 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 a narrow alert time window, the EIS is unlikely to effectively do so. Given that the research in this area continues to develop, this recommendation can be closed only if future research indicates a longer timeframe is unnecessary or if an alternative approach is otherwise proven to address concerns raised in the course of the audit. In other words, KCSO must provide evidence that EIS alerts are not merely flagging concerns that supervisors are already aware of due to the recency of the related incidents under a 90-day timeframe.

Recommendation 2

OPEN



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

STATUS UPDATE: In prior years, KCSO had begun considering additional EIS indicators. KCSO did not provide evidence that it has considered this any further since our August 2020 follow-up, however. As it planned in 2020, KCSO has committed to adopt a new EIS software, EIPro. While this recommendation could be addressed as part of KCSO's implementation of EIPro, adopting EIPro without identifying and reevaluating additional indicators for the EIS will not be sufficient to address this recommendation. Because KCSO has not made progress since the time of the 2020 follow-up, this recommendations status has been returned to "open" from "progress."

WHAT REMAINS: To complete this recommendation, KCSO needs to incorporate additional indicators into its EIS and ensure that these indicators are tracked correctly by staff. KCSO also needs to evaluate the effectiveness of any indicators it adds. While KCSO may complete this recommendation using EIPro, implementing EIPro alone will not address this recommendation. By completing 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.

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 evidence of reevaluation or refinement of its EIS alert algorithms as of the time of this follow up. KCSO states 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 EIPro implementation will 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. While KCSO may complete this recommendation using EIPro, implementing EIPro alone will not address this recommendation. By completing this recommendation, KCSO can improve the quality of EIS alerts, allowing it to better identify concerning employee behaviors early on and reduce the frequency of EIS alerts that do not suggest a legitimate 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: At the time of the 2020 follow up report, KCSO indicated it was interested in implementing EIPro, which it stated would better allow the office to compare staff while considering specific work environments. As of the time of this follow up, KCSO has officially decided to use EIPro, which has specific capabilities which would improve KCSO's ability to consider specific working environments. Because KCSO has decided to move forward with the solution presented at the time of the August 2020 follow-up (implementation of EIPro), the status of this recommendation remains as "progress." If KCSO does not take advantage of this functionality by implementing complementary processes, this recommendation could be returned to "open" in future follow-up reports.

WHAT REMAINS: To complete this recommendation, KCSO needs to ensure that the EIS systemically considers working environments for alert algorithms. This could be done by implementing EIPro and demonstrating how the software has allowed KCSO to consider alerts relative to specific working environments. By completing 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

OPEN



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: In prior years, KCSO provided evidence that it was developing procedures and forms detailing the types of interventions to use when responding to EIS alerts. KCSO has not provided evidence that it has considered this any further since the time of the August 2020 follow-up report. KCSO states that policies and procedures relating to this recommendation will be completed with the implementation of EIPro. Because KCSO has not made progress since the time of the 2020 follow-up, the status of this recommendation has returned to "open" from "progress."

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 completing 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: In prior years, KCSO provided evidence that it was developing procedures that would require an employee's direct supervisor to be involved in alert assessments. KCSO has not provided evidence that it has considered this any further since the time of our August 2020 follow-up report. KCSO states that EIPro would allow supervisors to view information on employees under their command, making it easier to involve them in the handling of alerts. Because KCSO has decided to move forward with the implementation of EIPro, which allows supervisors to view incident information for their direct reports, the status of this recommendation remains as "progress." If KCSO does not take advantage of this functionality by implementing complementary processes, this recommendation could be returned to "open" in future follow-up reports.

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 could also help complete this recommendation. This recommendation may also be satisfied using existing EIS software, if possible. By completing this recommendation, KCSO can ensure that alert responses receive input from supervisors who work most closely with employees, 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 prior years, KCSO staff had proposed a yearly review of the EIS, but no review process is in place at this time. KCSO has not provided evidence that it has considered this any further since our 2020 follow-up report. KCSO states that when EIPro is implemented KCSO will consistently evaluate its effectiveness and update associated policies, as necessary.

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. While KCSO may complete this recommendation using EIPro, implementing EIPro alone will not address this recommendation. By completing this recommendation, KCSO can ensure that changes made to the EIS are effective and that the EIS is meeting current organizational 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: KCSO has not presented any evidence of additional progress toward this recommendation since our 2020 follow-up report. KCSO states that an associated policy will not be drafted until EIPro is purchased and implemented.

WHAT REMAINS: To complete this recommendation, KCSO needs to determine and document the data it believes is necessary to evaluate EIS effectiveness and ensure that EIS policies or 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 acted in response to the alerts, and the actions the EIS users took in response to the alerts. While KCSO may complete this recommendation using EIPro, implementing EIPro alone will not address this recommendation. 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: KCSO has not presented any evidence of progress toward this recommendation since our 2020 follow-up report. KCSO states that EIPro, when adopted, will facilitate easier trend analysis.

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. While KCSO may complete this recommendation using EIPro, implementing EIPro alone will not address this recommendation. 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.