The Early Intervention System: Better Use Could Improve Accountability

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January 24, 2017

Executive Summary

The Early Intervention System (EIS) in the King County Sheriff's Office (KCSO) uses time and resources but is not achieving many of its potential benefits. Early Intervention Systems are meant to identify early signs of problematic officer behavior and facilitate intervention before larger issues arise. KCSO's EIS, however, is not designed or applied in a way that achieves these benefits. KCSO has not taken opportunities to continuously improve the functioning of its EIS, or the department overall, with information available through the system.

King County Auditor's Office

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Values: **Independence**   ~   **Credibility**   ~   **Impact**

The King County Auditor's Office was created by charter in 1969 as an independent agency within the legislative branch of county government. The office conducts oversight of county government through independent audits, capital projects oversight, and other studies. The results of this work are presented to the Metropolitan King County Council and are communicated to the King County Executive and the public. The King County Auditor's Office performs its work in accordance with Government Auditing Standards.

The Early Intervention System: Better Use Could Improve Accountability

Report Highlights

January 24, 2017

Why This Audit Is Important

Law enforcement accountability and performance are important to King County and the public for ethical and financial reasons. Over the past five years the County has paid over $21 million[1] in legal claims related to actions by King County Sheriff's Office's (KCSO) employees. Early Intervention Systems (EIS) are tools with the potential to improve officer performance, wellness, accountability, and risk management. If properly used, an EIS can help an agency address problematic behaviors before they lead to serious consequences. This audit assessed the effectiveness of KCSO's EIS and identified barriers to its success.

What We Found

The EIS as implemented at KCSO is not achieving its full potential. KCSO's EIS design limits its ability to detect the subtle issues that would make it most useful. For instance, KCSO's EIS alerts notify commanding officers of concerning behavior using data from only the last 90 days, a much shorter period than best practice. The EIS ability to detect problematic behavior is further compromised by its reliance on a limited range of information and lack of consideration of different working environments. The EIS is also underused with commanding officers handling alerts inconsistently, key supervisory staff not receiving alerts, and much of the valuable data it collects going unused. KCSO does not have an adequate framework in place to address the flaws of the system, resulting in the EIS using valuable resources while not clearly addressing goals.

What We Recommend

To enhance the effectiveness of the EIS, we recommend that KCSO revisit the 90-day alert threshold as well as other components of EIS design which prevent it from detecting subtle issues or distinguishing among officers by work environment. We also recommend that KCSO establish procedures to improve the consistency of alert responses, update alert processes to more directly involve front-line supervisors, and identify opportunities to evaluate and respond to trends using data from the EIS. We also make recommendations to ensure that KCSO can continuously improve its EIS to achieve agency goals.

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[1] Two large claims accounted for over $14 million of this amount.

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Appendices

Alternative Formats Available Upon Request

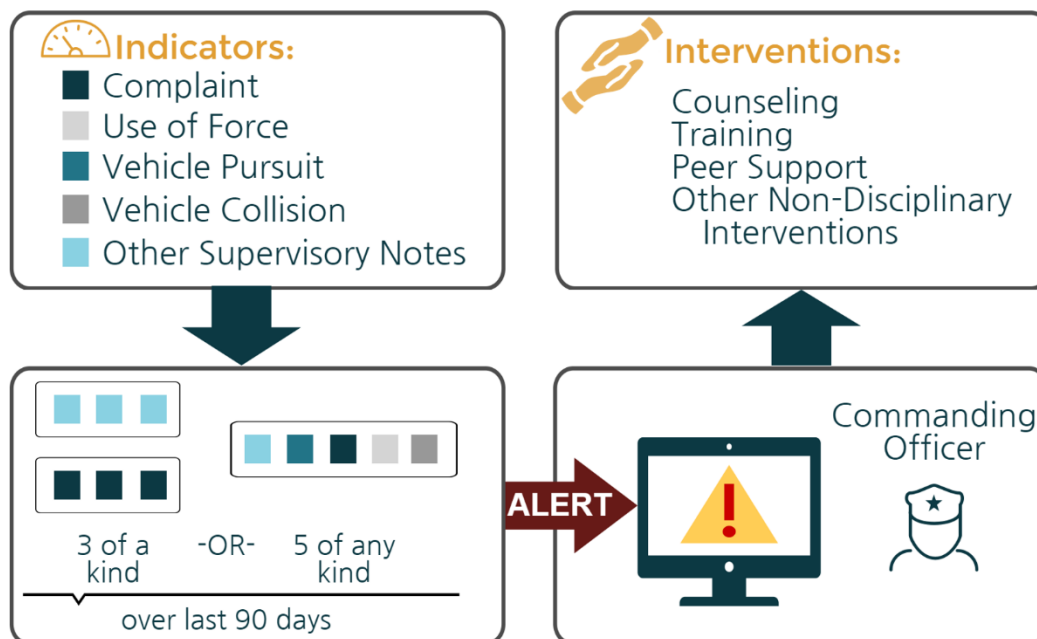# 1. Barriers to an Effective Early Intervention System

Section Summary

Early Intervention Systems (EIS) are useful tools for improving officer performance, wellness, accountability, and risk management, but King County's EIS is not designed or applied in a way that achieves these benefits. By helping the agency to identify and address problematic officer behavior early, an EIS can prevent larger incidents. Given the King County Sheriff Office's (KCSO) budget-related staffing challenges, an effective EIS could be integral in keeping management aware of performance issues. This opportunity is undercut by weaknesses in the structure and application of EIS that include a restrictive time frame during which incidents must occur, limited performance indicators, and other limitations due to system design. In addition, inconsistencies and lack of direct supervisor involvement further dilute EIS effectiveness.

What is EIS?

An EIS is a database of officer performance that alerts management to possible performance problems. The purpose of an EIS is not discipline, but rather support or education to promote positive behavior and reduce undesirable actions by officers. As shown in Exhibit A, the system uses a set of performance indicators selected by KCSO to alert commanding officers to the potential need for intervention. KCSO's EIS issues an alert when three of one indicator or five of any combination of indicators occur within 90 days.

Exhibit A: King County's EIS uses a set of indicators to alert commanding officers to potential issues.

Source: King County Auditor's Office

1. Barriers to an Effective Early Intervention System

Why use an EIS?

EIS is a generally accepted law enforcement best practice for accountability that can both support at-risk officers and manage risks to the county. The Department of Justice, the Commission for Accreditation of Law Enforcement Agencies, and the National Association of Civilian Oversight of Law Enforcement have all emphasized the value of EIS to address issues ranging from risk management to community relations. An effective EIS provides opportunity for a law enforcement agency to deal with concerning behaviors before they lead to more serious incidents. Law enforcement agencies can also use data from an EIS to look at patterns of employee behavior over time in order to tailor support, such as training or counseling, to an employee's specific needs.

Limited staffing and high risk make an EIS especially important for KCSO

An effective EIS would help mitigate KCSO's budget-related staffing limitations. King County Sheriff deputies, especially in rural precincts, have limited contact with supervisors, because they often have a large patrol area and with only a weekly roll call. This means that staying aware of officer behavioral issues can be particularly challenging for management. Because the EIS provides automatic notification of some issues, it allows management to stay aware of patterns of employee behavior in the absence of frequent direct contact. While the EIS does not replace interactions between an officer and their supervisor, it can help to address some of the gaps that are a result of limited staffing resources.

King County's risk register ranks improper use of force by a sheriff's deputy as one of the highest risks to the county. The risk register notes that use of force is "significantly within the County's capacity, authority, and resources to control." The EIS is an important tool in maintaining this control. By alerting commanding officers to problematic behavior early, it can allow them to address risky behaviors with their deputies. The risk register also notes that such an incident could have significant impacts on the county's reputation and finances. This is emphasized by the fact that the County has paid over $21 million in legal claims related to KCSO employee actions over approximately the past five years.[2] While an effective EIS would be unlikely to stop all such incidents, it could serve as part of a larger preventative strategy.

The EIS, as implemented, has significant shortcomings

While KCSO puts time and resources into its EIS, the current system configuration has significant shortcomings. The 90-day window, set of indicators used, algorithms applied, and other system parameters provide alerts that many in KCSO management do not find valuable. Addressing

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[2] Two large claims accounted for over $14 million of this amount.

1. Barriers to an Effective Early Intervention System

some of these issues could increase the number of alerts received while addressing others could decrease them. Ultimately, improvements would optimize the number and quality of alerts, making them more informative and useful. The four issues are discussed below:

1. 90-day alert window
2. Alert indicators
3. Equal weighting of indicators
4. Equal treatment of work environments

1. **Experts agree that the current 90-day window is too short and inflexible to detect subtle issues in officer performance, support officers in need of help, observe trends, or accomplish other goals. [3]** As shown in Exhibit B, a survey of law enforcement agencies across the country found that most alert windows span 12 months. In addition, in a recent annual EIS report, KCSO Human Resources (HR) acknowledged that a 90-day rolling threshold was not in line with best practices. The Auditor's Office made a recommendation to extend the 90-day period in 2012.

Exhibit B: King County's EIS uses a much smaller window than most law enforcement agencies surveyed.
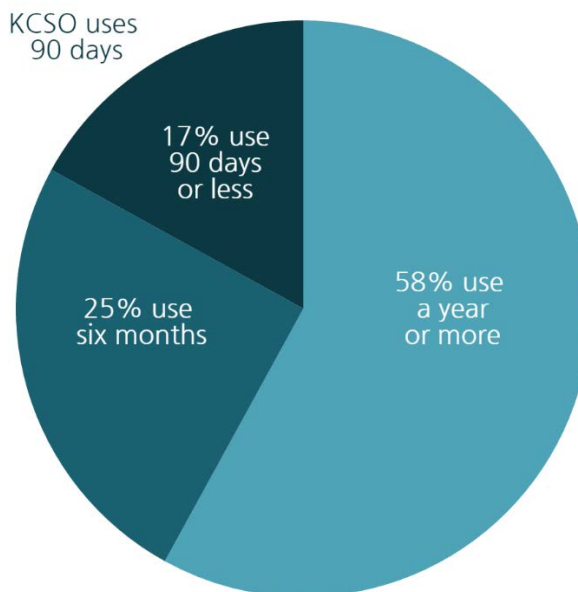
Source: Auditor's Office based on data from the John F. Finn Institute for Public Safety *Early Intervention Systems: The State of the Art*

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[3] One expert noted that "Patterns of conduct that may indicate an officer is in need of assistance or may be heading for difficulty rarely manifest themselves in such a brief time frame." The National Association of Civilian Oversight of Law Enforcement described the time frame as "too short to determine patterns and trends" as well as making it difficult to evaluate whether interventions have been effective.

1. Barriers to an Effective Early Intervention System

KCSO's short window has several significant impacts. It is:

- **Ineffective:** The EIS may not detect preventable problems that are more subtle. By using such a short time frame, KCSO may not detect longer-term problematic behaviors.
- **Not Timely:** It may be too late for early intervention if an officer is involved in five incidents in such a short time. For example, if within just 90 days an officer has a collision, a use of force, two complaints, and a pursuit, it may be past the point of early intervention and require more forceful action. Using such a short time frame makes it difficult to detect longer-term, more subtle issues that may be better suited to discovery through EIS.
- **Redundant:** Commanding officers receive alerts about behaviors they are likely already reviewing and responding to. This is because there are other review processes in place for the events that KCSO currently uses as indicators in its EIS. For example, if an officer was involved in a collision as one of the indicators that triggered an alert, the commanding officer and KCSO's Driving Review Board would likely have already reviewed these incidents individually to check for policy violations or concerning behavior. The 90-day alert window ensures that separate reviews will have occurred very recently and will still be fresh in the reviewers' memory.
- **Inefficient:** Using an EIS expends limited supervision resources with potentially little benefit.

Recommendation 1	The King County Sheriff's Office should increase the Early Intervention System alert window as previously recommended in 2012.

2. **The set of indicators that KCSO uses to determine when to send an alert limits EIS sensitivity.** KCSO uses a relatively small number of indicators relative to those available, as shown in Exhibit C. A survey of the agencies that use an EIS conducted by the John F. Finn Institute for Public Safety showed that almost half of agencies use 10 or more indicators. This is twice the number used by KCSO. This means that KCSO commanding officers may not be alerted to relevant issues, missing opportunities to address potentially problematic behaviors early on.

1. Barriers to an Effective Early Intervention System

Exhibit C: King County's EIS uses a narrower range of indicators than most law enforcement agencies surveyed.

KCSO indicators
Complaints
Use of force
Vehicle pursuit
Vehicle collision
Other supervisory notes

Other common indicators
Tardiness
Civil suits
Officer injury
Sick days used
Policy violations
Firearm discharges
Loss of equipment
Internal reprimands
Discretionary arrests
Internal investigations
Failure to get a physical
Unsatisfactory evaluation
Failure to appear in court
Failure to complete training
Sick leave linked with days off
Sick leave linked with vacation

Source: Auditor's Office based on data from the John F. Finn Institute for Public Safety *Early Intervention Systems: The State of the Art*

A majority of commanding officers we interviewed said that alerts rarely provide new information. This may be because all but one of the indicators used by KCSO have parallel review processes involving the commanding officer, as noted above. This issue is exacerbated by the 90-day alert window, which means that the parallel review will have occurred very recently. As a result, the events tracked in the EIS may already be fresh in the minds of commanders and supervisors. Many of the indicators used in other jurisdictions (see Exhibit C) do not have parallel processes, making them more likely to provide new information for the commanding officer.

Recommendation 2

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

3. **KCSO's EIS treats all incidents as equivalent, missing an opportunity to have a more precise system.** In its most recent annual EIS report, KCSO HR identified a need to analyze EIS data to "establish meaningful thresholds and triggers," now that they have three years of consistent data.[4] At KCSO, if the same type of incident happens three times over 90-days, it will trigger an alert. However, other agencies often take into account the differing severity of different types of incidents by adjusting their alert formula. For example, to trigger an alert an agency might require several occurrences of a mild incident, but only one severe incident. Alternatively, agencies could adjust the time frames for certain indicators; for instance, the EIS could trigger an alert for being late twice in a week or for being involved in a vehicle collision twice in a year.

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[4] In this context, "thresholds and triggers" are the time frame within which incidents must occur, and the number of incidents that must occur within that time frame in order for an alert to occur.

1. Barriers to an Effective Early Intervention System

Recommendation 3	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.

4. By default, the EIS treats all work environments as equivalent, decreasing equity across flagged employees, system effectiveness, and increasing effort for commanding officers. A "work environment" is the context within which an officer works. For example, one officer may work in a quiet rural precinct and another might work in an active urban setting. Because alert parameters are the same regardless of work environment, officers in some precincts receive a larger number of alerts as a matter of course and not necessarily because it is predictive of a need for intervention. Some precincts have a great deal of activity, so officers working there are more likely to be involved in pursuits. For instance, one commanding officer's territory accounted for 57 percent of all alerts. This means that this commanding officer may be responding to alerts that are more a result of the active work environment than a need for early intervention. This may dilute their significance for commanding officers that receive the vast majority of alerts. At the same time, commanding officers in less active precincts might not be alerted to questionable behavior even if it is atypical for the officer's assignment. Currently, each commanding officer must solely use their discretion to account for differing work environments. Building consideration of different environments into the EIS upfront could reduce both the risk of inconsistency and the amount of effort it takes to interpret alerts.

Recommendation 4	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.

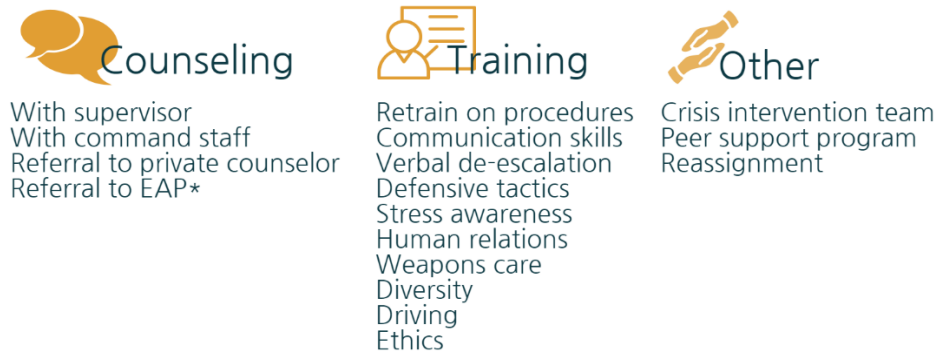|	

Written guidance could help supervisors use the EIS more consistently	**While there are some effective common practices among commanding officers, the way they handle alerts is still inconsistent.** Without consistency, KCSO cannot be sure that the EIS is deployed effectively and fairly. While there are many processes that KCSO should formalize in its procedures, we identified three primary areas where written procedures would give commanding officers more uniform guidance for
	    1. how to respond to an alert
	    2. when to respond to an alert
	    3. what to report to HR about an alert.

1. Barriers to an Effective Early Intervention System

1. **There is no clear guidance on how to intervene in the event an officer triggers an EIS alert.** Exhibit D shows examples of interventions used by other jurisdictions, most of which are not detailed in KCSO guidance. Well-timed and targeted interventions are key to an effective EIS. KCSO's EIS guidance only provides broad examples of interventions: "counseling, training, or coaching." There is no specific guidance about how and when to intervene in different circumstances.

Exhibit D: Common interventions in other jurisdictions, many of which are not used by KCSO.

Counseling
With supervisor
With command staff
Referral to private counselor
Referral to EAP*

Training
Retrain on procedures
Communication skills
Verbal de-escalation
Defensive tactics
Stress awareness
Human relations
Weapons care
Diversity
Driving
Ethics

Other
Crisis intervention team
Peer support program
Reassignment

* Employee Assistance Program
Source: Auditor's Office based on data from the John F. Finn Institute for Public Safety *Early Intervention Systems: The State of the Art*

Most commanding officers note that they choose their intervention based upon the pattern of employee behavior, but their emphasis on different types of interventions varies. For example, some commanding officers addressed the importance of tailored training, while others emphasized informal conversation. While some degree of flexibility may be necessary to allow a supervisor to individually tailor their response, intervention should not vary widely among supervisors. Given that there is such different treatment depending on the commanding officer, it is difficult to demonstrate equity in the EIS's application.

2. **There is limited formal guidance detailing how quickly commanding officers should respond to an alert, so timelines vary.** Alert response requests that HR sends to commanding officers provide a deadline, but these do not always result in timely responses. While the majority of commanding officers respond to alerts within 30 days, time frames for alert responses ranged between 4 and 57 days, as is shown in Exhibit E. One reason for this inconsistency may be that KCSO does not have detailed operating procedures for EIS processes. While a standard operating procedure for the EIS explains how HR manages EIS alerts, the standard operating procedures and the entry in the General Orders Manual do not provide enough detail to support consistency.

1. Barriers to an Effective Early Intervention System

Exhibit E: Although most responses occur within four weeks, alert response times at KCSO vary widely.
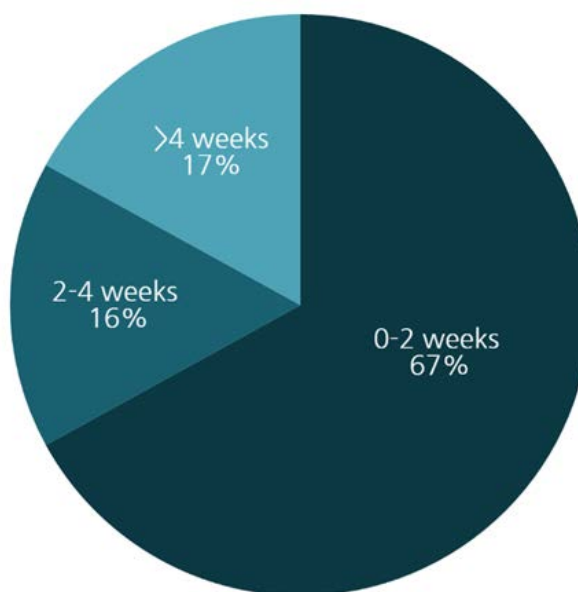
Source: Auditor's Office analysis of KCSO data

3. **There is no clear guidance for commanding officers on what to report to KCSO HR about how they have responded to an alert.** The level of detail provided in most alert responses do not provide enough information to objectively interpret what kinds of interventions have been employed and whether they resulted from the alert or from another process. For example, instead of detailed descriptions of how they handled the alert, a third of records entered by commanding officers stated "Approved." In 17 percent of alerts, HR did not receive any response from commanding officers. While HR has successfully followed up on missing or incomplete alert responses, this does not fully address consistency issues.

Recommendation 5

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.

KCSO underuses direct supervisors

Direct supervisors are the key to success for EIS, but KCSO does not directly involve them consistently in alert responses. Experts and the literature on EIS consistently confirm the importance of front-line supervisors for an effective EIS. This is because "in most cases, they are the first to observe potentially problematic behavior among their officers." Supervisors are more likely to have direct relationships with officers, observe professional behavior in the field or in written documentation, and already have coaching relationships established. Most alerts at KCSO go

1. Barriers to an Effective Early Intervention System

exclusively to the officer's commanding officer. Direct supervisors may be involved in alert response at their commanding officer's discretion, but how much of a role they play varies by commanding officer. Some direct supervisors actively decide on interventions and directly respond to alerts, while others are rarely involved in them.

Recommendation 6	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.

2. Improving Performance with EIS Information

Section Summary

KCSO has not actively used information from the EIS, missing opportunities to continuously improve its EIS and the department. An EIS has been in place at KCSO since 2009, but it has not yet been rigorously evaluated or refined, making it difficult to identify and resolve problems that keep it from being effective. In order to evaluate the system, KCSO must collect complete data on the occurrence of alerts and interventions. In addition, KCSO has not used the EIS to its full capacity in identifying trends and opportunities to improve performance across the department.

KCSO's EIS has not been refined since its inception

KCSO has not rigorously evaluated or made refinements to its EIS since it was implemented in 2009. KCSO HR produces an annual report on the EIS and provides it to the Sheriff. While these reports make useful observations and recommendations, they have not prompted changes to the EIS. In all three of the most recent EIS annual reports, KCSO HR recommended creating a working group to evaluate and enhance the system. This recommendation has not been implemented. While HR has spoken to some staff about its ideas for improving the system, KCSO has not created this working group or carefully evaluated the EIS.

KCSO currently applies inefficient EIS processes that could be addressed through process improvements. For example, employees must manually review and correct alerts at multiple points in the alert process. HR reviews alerts to make sure they are valid before forwarding them to the appropriate commanding officer. The commanding officer must then review the alert and respond. In addition, as described in the previous section, there are redundant review processes for most of the indicators used in KCSO's EIS. Other examples of inefficiencies stem from the 90-day alert window and how incidents trigger alerts. Further collaborations with the technology vendor, adjustments to thresholds, and process flow improvements could all increase efficiency and free up time for key staff that could be better spent elsewhere.

Recommendation 7

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

KCSO cannot say whether the EIS is effective

KCSO does not collect adequate information on incidents or alert responses to determine if the EIS is effective. To objectively assess the EIS, KCSO would need to understand when alerts occurred, when and if a commanding officer intervened in response to the alert, and how the officer intervened. Alert responses vary widely and rarely make it clear whether or

2. Improving Performance with EIS Information

how a commanding officer handled the alert. This means that KCSO cannot determine how often alerts lead to interventions or how effective different interventions are.

Recommendation 8

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.

KCSO has not used trend analysis to evaluate and improve the department

KCSO conducts limited trend analysis using EIS data, but has not taken advantage of opportunities to use this data when evaluating and improving the performance of the department. Data from an EIS can be used to understand departmental activities across a large spectrum of issues, but KCSO has not used it this way. This means that KCSO has not used opportunities to track its overall agency performance and monitor (and potentially correct) trends in specific incidents, such as use of force or interactions with different demographic groups. Other agencies have used EIS data to evaluate specific divisions and identify whether there are problem patterns, as well as to examine fired employee histories to identify root causes and set preventive measures for the future.

Recommendation 9

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.

Executive Response

SHERIFF
KING COUNTY

KING COUNTY SHERIFF'S OFFICE
516 Third Avenue, W-116
Seattle, WA 98104

John Urquhart
Sheriff

November 21, 2016

Ms. Kymber Waltmunson, Auditor
King County Auditor's Office
516 Third Avenue, W-1033
Seattle, WA 98104

RE: Early Intervention System Audit

Dear Ms. Waltmunson:

My staff has received and reviewed the King County Auditor Office's draft report on the King County Sheriff's Office (KCSO) Early Intervention System. I appreciate the time and effort your staff put into the report. You will find that I concur with every recommendation made in your report, with certain contingencies as resources and partners allow.

Attached to this letter is a matrix indicating KCSO's official responses to your office's recommendations. If you or your staff has any comments or questions, please contact my Chief of Staff, Chris Barringer, at 206.263.2559.

Very truly yours,

John Urquhart
Sheriff

Recommendation No. 1

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

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**2017 or 2018**	**KCSO, King County Council**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		
Contingent on separate successful negotiations with affected labor groups on EIS alert window ultimately approved by the King County Council.		

Recommendation No. 2

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

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		
Contingent on compatibility with current software.		

Recommendation No. 3

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.

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**Annually beginning in 2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		

Recommendation No. 4

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.

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		

Recommendation No. 5

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.

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		

Recommendation No. 6

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.

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**Already implemented at several levels, full implantation in early 2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		

Recommendation No. 7

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

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**Annually beginning in 2017**	**2017**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		

Recommendation No. 8

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.

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		
Contingent on compatibility with existing software.		

Recommendation No. 9

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.

Select concurrence below	Implementation date or N/A	Responsible agency
Concur	**Annually beginning in 2017**	**KCSO**
Agency concurrence comment, or reason for partial or non-concurrence for recommendation		

Statement of Compliance, Scope, Objective & Methodology

Statement of Compliance with Government 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.

Scope of Work on Internal Controls

We assessed internal controls relevant to the audit objectives. This included review of selected policies, processes, and reports, as well as interviews with knowledgeable King County Sheriff's Office (Sheriff's Office) staff. In performing our work, we identified and have reported on concerns related to operational controls over the use of the Early Intervention System (EIS) in the Sheriff's Office.

Audit Scope and Objective

This audit examined the Sheriff Office's EIS, both its design and how it is used in the Sheriff's Office. The objective of this audit was to determine to what extent the Sheriff Office's EIS is designed and applied to meet best practices.

Methodology

To achieve the objectives listed, the King County Auditor's Office (Auditor's Office) conducted a literature review and contracted with a nationally recognized expert on EIS (Professor Sam Walker) to identify the important standards for EIS. We then contracted with law enforcement agency consultants (the OIR Group) to assist in evaluating the Sheriff's Office's adherence to these standards. The Auditor's Office and the OIR Group interviewed management and key staff at the Sheriff's Office and reviewed relevant policies and procedures on EIS in the Sheriff's Office to understand how the EIS functions in King County. The consultants also interviewed EIS users in other law enforcement agencies to identify lessons from their jurisdictions.

To understand how EIS is used in the Sheriff's Office, we reviewed alert records for a 90-day period ending on July 12, 2016. We assessed how commanding officers responded to alerts, the level of detail of responses, and the length of time from when an alert was issued to when the commanding officer provided a response. We also identified how frequently different commanding officers received alerts in the 90-day period, as well as common incident types. To understand how the EIS functions in relation to other processes in the Sheriff's Office, the Auditor's Office reviewed processes related to indicators used in the EIS.

List of Recommendations & Implementation Schedule

Recommendation 1: The King County Sheriff's Office should increase the Early Intervention System alert window as previously recommended in 2012.

> **Implementation Date:** 2017
> **Estimate of Impact:** By increasing the alert window the Sheriff's Office will improve the Early Intervention System's ability to detect potentially concerning behavior. Detecting these behaviors early will allow the Sheriff's Office to help officers improve and protect the county from reputational and financial damage.

Recommendation 2: The King County Sheriff's Office should identify and regularly reevaluate additional indicators for the Early Intervention System.

> **Implementation Date:** 2017
> **Estimate of Impact:** By identifying and regularly reevaluating indicators the Sheriff's Office can better optimize the Early Intervention System. This will improve the system's ability to detect concerning behaviors, improving officer performance and protecting the county from reputational and financial damage.

Recommendation 3: 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.

> **Implementation Date:** Annually beginning in 2017
> **Estimate of Impact:** By regularly reevaluating and refining alert algorithms the Sheriff's Office can better optimize the Early Intervention System. This will improve the system's ability to detect concerning behaviors, improving officer performance and protecting the county from reputational and financial damage.

Recommendation 4: 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.

> **Implementation Date:** 2017
> **Estimate of Impact:** Designing the parameters of the Early Intervention System to consider specific working environments will allow the Sheriff's Office to reduce the number of alerts due to normal police work and identify problematic behaviors of officers in less busy environments. This could save time spent reviewing alerts and enhance the system's ability to detect concerning behaviors, improving officer performance and protecting the county from reputational and financial damage.

Recommendation 5: 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.

> **Implementation Date:** 2017
> **Estimate of Impact:** By implementing more specific written procedures the Sheriff's Office can improve alert management and more consistently collect valuable data. This data can be used to inform subsequent system improvements.

Recommendation 6: 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.

> **Implementation Date:** Already implemented at several levels, full implantation in early 2017
> **Estimate of Impact:** More directly involving direct supervisors in alert management will allow the Sheriff's Office to leverage its knowledge and direct experience with flagged officers. This will allow the Sheriff's Office to improve alert management, particularly in regards to interventions.

Recommendation 7: The King County Sheriff's Office should evaluate the Early Intervention System and develop a continuous improvement plan.

> **Implementation Date:** Annually beginning in 2017
> **Estimate of Impact:** Developing and implementing a continuous improvement plan will allow the Sheriff's Office to refine the Early Intervention System to match their circumstances. This will improve the system's ability to detect concerning behaviors, improving officer performance and protecting the County from reputational and financial damage.

Recommendation 8: 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.

> **Implementation Date:** 2017
> **Estimate of Impact:** In order to more fully assess the Early Intervention System, the Sheriff's Office needs reliable information to use for its analysis. Collecting and keeping this data will ensure that it can be used to continuously improve the system.

Recommendation 9: 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.

    Implementation Date: Annually beginning in 2017

    Estimate of Impact: By taking advantage of the data available through the Early Intervention System, the Sheriff's Office can analyze itself in a variety of ways. By evaluating and responding to trends the Sheriff's Office can continue to improve practices and protect the county from reputational and financial damage.