

Performance Audit of SDPD Overtime

FEBRUARY 2024 | OCA-24-08

Finding 1

To ensure officers are available to respond to the public, SDPD does not limit overtime, risking fatigued officers.

Finding 2

While SDPD overtime spending is in line with other police departments, more civilian positions could help reduce overtime costs and improve response times.

Finding 3

Overall, SDPD overtime tracking and authorization is accurate.

Andy Hanau, City Auditor

Matthew Helm, Assistant City Auditor

Carissa Nash, Principal Performance Auditor

Niki Kalmus, Senior Performance Auditor

Stephanie Potts, Performance Auditor

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The Office of the City Auditor would like to thank staff from the following departments for their assistance during this audit:

- San Diego Police Department
- Department of Finance
- Independent Budget Analyst



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600 B Street, Suite 1350, San Diego, CA 92101

Performance Audit of SDPD Overtime

Why OCA Did This Study

The City of San Diego (City) spent more than \$50 million on police overtime last year and has spent more than was budgeted on overtime for 10 of the last 11 fiscal years. The San Diego Police Department (SDPD) faces tension between the cost of overtime and the struggle to hire and retain more officers. Limiting officers' overtime hours might reduce costs, but could mean fewer officers are available to address public safety needs.

Therefore, we conducted a performance audit with four objectives:

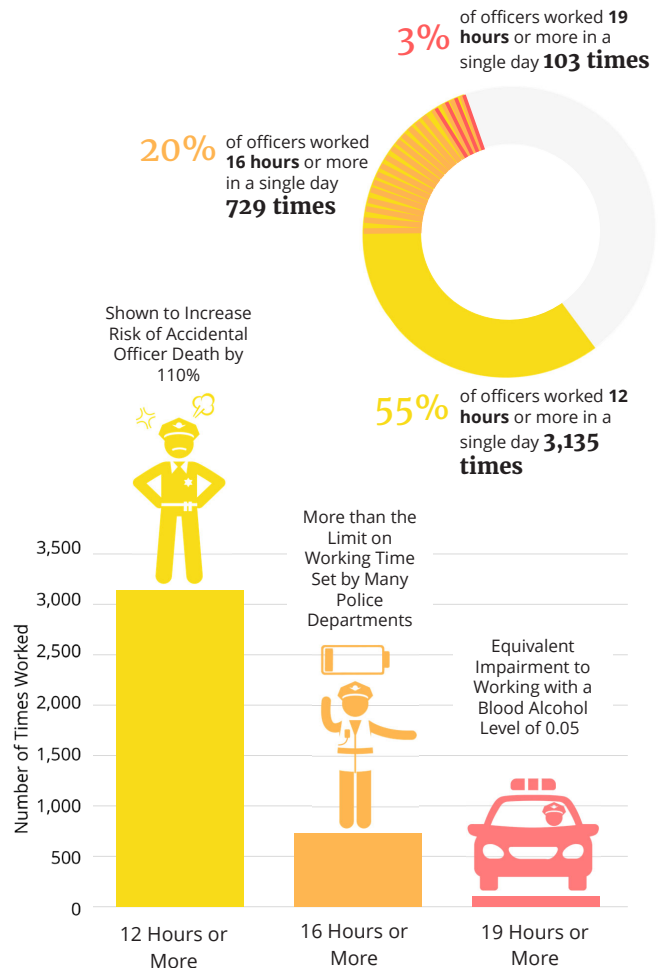
1. Determine if SDPD's overtime policies are in line with best practices.
2. Determine if SDPD's overtime policies are followed.
3. Determine if SDPD's overtime costs are in line with comparable police agencies.
4. Determine what factors contribute most to SDPD overtime costs and if there are opportunities to reduce costs.

What OCA Found

Finding 1: To ensure officers are available to respond to the public, SDPD does not limit overtime, risking fatigued officers.

- Officer fatigue can lead to accidents, injuries, and reduced cognitive performance and communication abilities. **Many police departments limit total hours worked** per day or per week to reduce officer fatigue.
- In contrast, **SDPD does not limit excessive overtime.** SDPD encourages officers to take an 8-hour break between shifts, but it is **an informal policy that is not enforced.**
- Despite SDPD's lack of overtime limits, most SDPD officers do not work excessive overtime. However, 50 officers each worked more than 1,000 hours of overtime last fiscal year. In addition, **a few officers worked more than 2,000 hours of overtime, averaging nearly 90 hours of total work per week, every week of the year** in FY2023.
- We also found **960 officers worked 12 or more hours in a single day at least once** in April 2023.

Exhibit 4: In April 2023, a Significant Portion of SDPD Officers Worked More Hours in a Single Day Than Best Practices Recommend



Source: OCA generated based on payroll data from SAP, research in the National Institute of Justice Journal and FBI Law Enforcement Bulletin, and policies from comparable cities.

- Although rare, we found examples of officers working **16-hour or longer days with fewer than 8 hours off between shifts** for multiple days in a row.
- We found **daily or weekly limits on overtime would likely reduce total overtime hours by less than 3 percent in a year.** This would reduce the risks of officer fatigue while having relatively minimal operational impacts.
- **SDPD does not prioritize overtime shifts based on need,** creating the risk that more critical assignments go unfilled while officers sign up for less critical shifts.

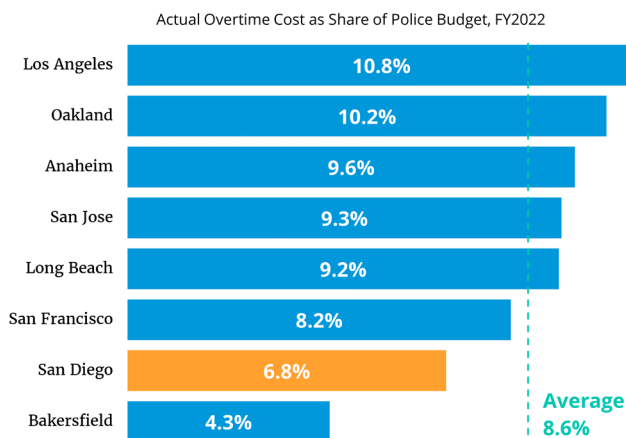
Finding 2: While SDPD overtime spending is in line with other police departments, more civilian positions could help reduce overtime costs and improve response times.

- SDPD overtime costs are primarily driven by staffing needs. As SDPD struggles to hire and retain officers, **it uses overtime meet the City’s public safety needs.**
- SDPD response times have largely increased since FY2019, **even with increased overtime, meaning overtime alone is unlikely to fully address SDPD’s needs.**
- Hiring more civilian employees who do administrative work and respond to lower-risk calls may reduce overtime, improve response times, and decrease department expenditures.
- **SDPD can strengthen its analysis on how many civilian positions would be necessary to maximize resources.** Our analysis shows that one type of civilian position could respond to about 13 percent of SDPD’s calls.
- SDPD overtime spending is regularly overbudget, but SDPD and the Department of Finance say they are working to budget more accurately. **SDPD overtime costs were below average for large cities in California in FY2022.**

Finding 3: Overall, SDPD overtime tracking and authorization is accurate.

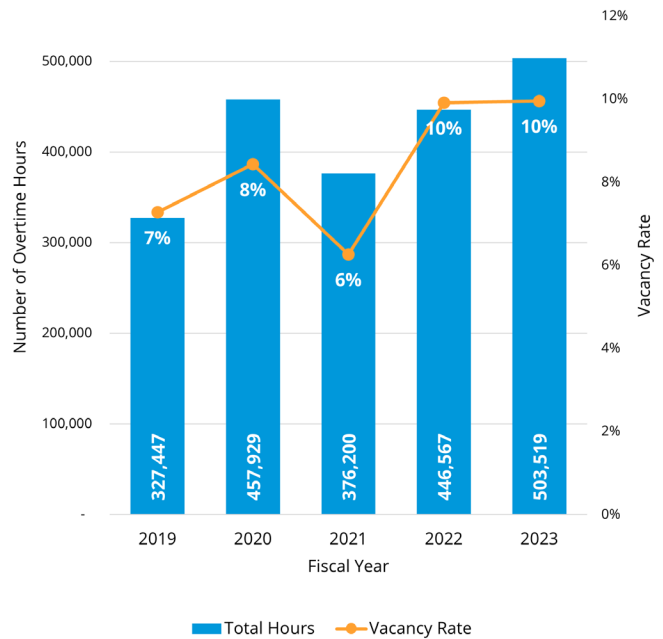
- In a random sample of overtime shifts from May 2023, we found that **100 percent of sampled shifts had the required overtime authorization form submitted and the forms contained accurate, required information.**

Exhibit 15: SDPD Overtime Spending Was Below the Average for Large Cities in California in FY2022



Source: OCA generated based on publicly accessible city budgets and budget proposals.

Exhibit 11: The Officer Vacancy Rate at SDPD Has Generally Increased, While the Overtime Increased by More Than 50 Percent



Source: OCA generated based on payroll, personnel, and budget data from SAP.

What OCA Recommends

We made 4 recommendations to SDPD. Key recommendations include:

- SDPD should require that officers **take an 8-hour break between shifts.**
- SDPD should **prioritize its overtime allocation**, potentially through a central overtime function, then determine if it should **set a limit on the maximum number of hours officers can work in a day or a rolling week** using available research on officer fatigue.
- Once SDPD has set a work hours limit, it should enable notifications to ensure the total number of hours officers work in a day or rolling week **do not exceed any limits** set by SDPD policy.
- SDPD should analyze how many Police Investigative Service Officers or similar civilian positions would be necessary to **maximize resources.**

SDPD agreed to all 4 recommendations.

For more information, contact Andy Hanau, City Auditor, at (619) 533-3165 or cityauditor@sandiego.gov.

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Background

The City spent more than \$50 million on police overtime last year and has spent more than it budgeted on overtime for 10 of the last 11 fiscal years. Limiting officers' overtime hours might reduce costs, but could mean fewer officers are available to address public safety needs. The San Diego Police Department (SDPD) faces tension between the cost of overtime and the struggle to hire and retain more officers so overtime is not as necessary. Therefore, we conducted a performance audit of SDPD overtime in accordance with the Office of the City Auditor's Fiscal Year (FY) Audit Work Plan. The objectives of this audit were to:

1. Determine if SDPD's overtime policies are in line with best practices.
2. Determine if SDPD's overtime policies are followed.
3. Determine if SDPD's overtime costs are in line with comparable police agencies.
4. Determine what factors contribute most to SDPD overtime costs and if there are opportunities to reduce overtime costs.

SDPD employed about 1,800 sworn police officers and 500 other staff as of October 1, 2023.

In FY2023, SDPD was budgeted for 2,664 positions but had filled only 2,326 total positions, including 1,827 sworn police officers and 499 other staff, as of October 1, 2023. SDPD operates 24 hours a day, 365 days a year, and police officers work overtime to respond to the needs of the community, such as responding to emergency calls for police services.

When possible, SDPD uses overtime to achieve its minimum staffing level, which ensures enough officers are working patrol to cover emergencies, fill shifts when officers are absent, and perform other necessary tasks. SDPD determines how many officers it needs to work overtime using its staffing model, which describes how many officers are required to maintain service levels in each of the department's patrol divisions. The Office of the City Auditor reviewed SDPD's staffing model in its 2013 audit of police patrol operations and recommended that SDPD analyze dispatch data to refine its staffing model. SDPD

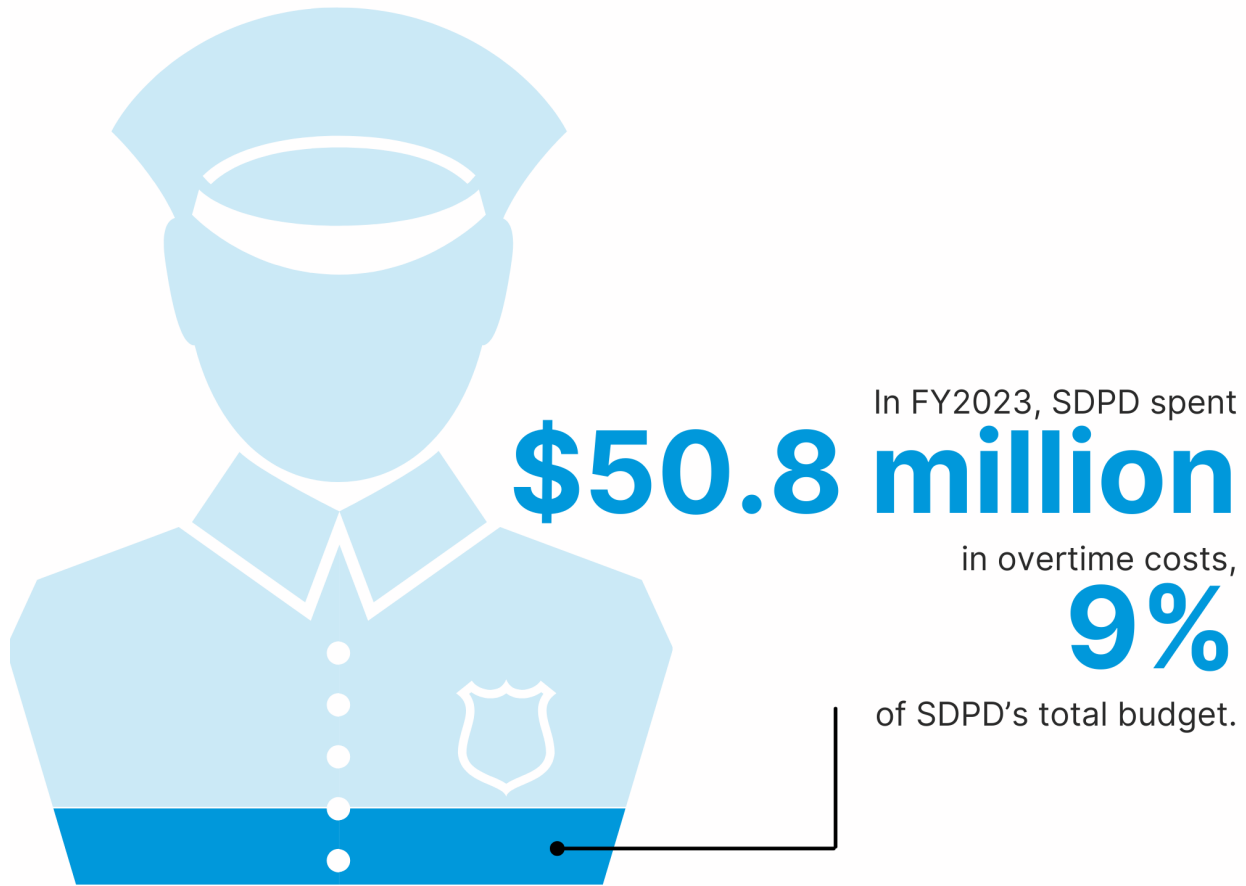
implemented this recommendation in 2020. As such, the staffing model has been excluded from this audit.

Overtime costs made up 9 percent of SDPD’s total expenditures in FY2023.

The City budgeted \$594 million in total for SDPD in FY2023. The City budgeted \$40.2 million in overtime costs, 7 percent of SDPD’s total budget. As shown in **Exhibit 1**, SDPD spent \$50.8 million in overtime costs, 9 percent of SDPD’s total expenditures.

Exhibit 1

SDPD Spent About \$50 million on Overtime Last Fiscal Year



Source: OCA generated using budget data from SAP.

Overtime at SDPD is largely voluntary.

SDPD administers overtime in accordance with various laws and union agreements. According to the Fair Labor Standards Act and City policy, certain employees must receive overtime pay for any hours worked beyond their regular shift at a premium compensation rate, at least time and one-half their regular rate of pay. Per the City's Personnel Manual, sworn officers who are eligible for premium rate overtime at SDPD include Police Detectives, Officers, Sergeants, and Recruits. Police Captains and Lieutenants are also sworn officers but are ineligible for premium rate overtime.

Typically, officers at SDPD work four 10-hour shifts per week. Sworn officers are not regularly required to work overtime, meaning most overtime is worked on a voluntary basis. According to SDPD, it will require officers to work 12-hour shifts during some summer holidays and may require overtime as-needed during emergency situations. Some civilian employees at SDPD, such as dispatchers, are also required to work overtime in emergency situations.

SDPD officers may work planned or unplanned overtime.

According to SDPD, overtime for officers may be planned or unplanned. Planned overtime occurs when officers elect to work an overtime shift in advance, as is the case with special events and patrol staffing backfill overtime. Each division's captain is responsible for identifying in advance when they will need officers to work overtime to reach minimum staffing levels, and then finding officers to work those shifts. Unplanned overtime occurs when an officer unexpectedly must extend their shift or is called back to work for an emergency. An example would be calling SWAT or homicide units back for specialized expertise. **Exhibit 2** lists the most used overtime shift types at SDPD in recent years.

Exhibit 2

SDPD Requires Officers to Categorize the Type of Work They Did During Their Overtime Shift

Type of Overtime Shift	Definition
 Patrol Staffing Backfill	When an officer works a patrol shift outside of their regular working shift to address staffing needs. Working patrol can typically include driving a police car to scenes of reported crimes called in to SDPD through 9-1-1, such as driving to the scene and interviewing a person who reported a burglary or arresting criminal violators.
 Extension of Shift	When an officer's shift is extended beyond its normal start or end time. It may be used for operational purposes, such as significant investigations, or to address staffing needs.
 Holiday Premium	When an officer works on a City-observed holiday, they earn premium compensation.
 Neighborhood Policing	When an officer works an overtime shift in the Neighborhood Policing Division, which addresses neighborhood concerns and quality-of-life issues brought forward by citizens and businesses in the City, such as encampment abatement and connecting homeless individuals with services.
 Clean SD	When an officer works on a Clean SD crew. Clean SD is a City initiative that aims to reduce unsanitary conditions in public spaces, address quality of life issues, and offer services to individuals experiencing homelessness.
 Reports	When an officer must work overtime to complete the required reports for the incidents they responded to during their shift.
 Special Events	When an officer works at a special event, such as athletic events, street fairs, concerts, or other large gatherings that require crowd or traffic control.
 Call Back	When an officer is called back to duty for an emergency. This usually applies to officers on specialized teams like SWAT or homicide, but all officers may be subject to emergency call back.
 Court	When an officer is required under subpoenas or other formal notification to appear in court or any other administrative hearing outside of their regular shift hours.

Note: This is not a complete list of overtime shift categories; these categories were the most commonly used categories in FY2023.

Source: OCA generated from SDPD manuals, policies, and interviews with SDPD.

SDPD requires officers to complete overtime authorization forms after working an overtime shift.

According to SDPD, overtime for officers is largely voluntary and assigned on a first come, first served basis. Each division at SDPD competes equally for officers to volunteer for available overtime shifts. Divisions decide the best way for officers to claim overtime shifts; divisions may email all officers a list of available shifts, use a collaborative electronic document, or use other methods to allow officers to fill the shifts they would like to fill.

After working an overtime shift, officers must complete a handwritten overtime authorization form, which includes the date, time, and type of the overtime shift, a description of the work completed during the shift, and the signature of an approving supervisor. After the supervisor signs the form, a copy is sent to SDPD's payroll office, where payroll staff reconcile it with SAP, the City's timekeeping system, and the employee is compensated for the overtime in their next paycheck. According to SDPD, supervisors monitor overtime when they reconcile overtime forms and can deny officer requests for overtime if there are performance issues.

Finding 1

To ensure officers are available to respond to the public, SDPD does not limit overtime, risking fatigued officers.

Finding Summary

The San Diego Police Department (SDPD) acknowledges that there is a tradeoff between responding to calls from the public and the risk of fatigued officers working long shifts. Working while fatigued can lead to accidents, injuries, reduced cognitive performance, and weakened communication abilities. Although we found that most officers do not work excessive hours, 50 officers each worked more than 1,000 hours of overtime in fiscal year (FY) 2023.

To reduce risks to officers and the public, many police departments limit the number of hours an officer can work so they are less likely to be fatigued. However, to respond to calls in a timely manner with limited staffing, SDPD does not limit overtime. Although we acknowledge that responding to the public is an essential service officers provide, we recommend SDPD at minimum require officers take an 8-hour break between shifts and consider limiting the total daily and weekly hours an officer can work.

Imposing limits on overtime to reduce the number of fatigued officers working will also mean fewer officers to respond to calls, but the overall reduction is relatively small. We found daily or weekly limits on overtime would likely reduce total overtime hours by less than 3 percent.

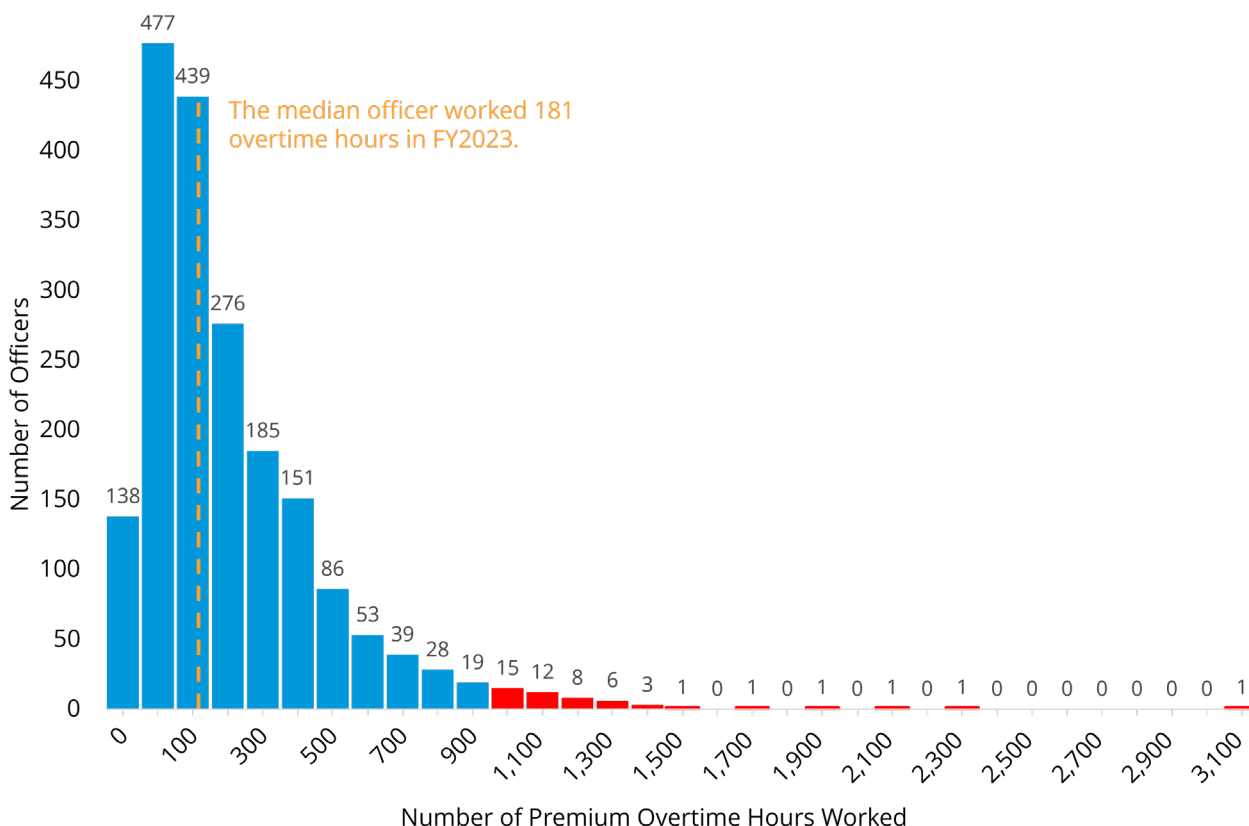
In addition, because overtime is largely voluntary, according to SDPD, officers may be volunteering for certain overtime assignments, while other assignments that more urgently need officers go unfilled. We recommend SDPD prioritize overtime needs so that it uses its limited officer resources more efficiently while understaffed. Through centralizing overtime management and prioritizing overtime shifts based on need, SDPD can ensure that the approximately \$50 million a year the City spends on police overtime has the greatest public safety benefit.

Most SDPD officers do not work excessive overtime.

Most officers worked fewer than 100 overtime hours in FY2023. However, the number of overtime hours each officer worked in FY2023 ranged from 0 hours to 3,151 hours, as shown in **Exhibit 3**. The broad range of overtime worked by officers is because overtime is largely voluntary at SDPD, except for certain holidays, emergencies, or other necessary operations. Additionally, some officers choose to work more overtime than others. The median officer worked 181 overtime hours in FY2023, which is approximately 3.5 hours per week over the course of a year.

Exhibit 3

The Number of Overtime Hours Worked by Officers in FY2023 Ranged from 0–3,151 Hours



Source: OCA generated based on payroll data from SAP.

However, 50 officers each worked more than 1,000 hours of overtime last fiscal year.

We defined excessive overtime as working more than 1,000 overtime hours in one year based on other jurisdictions' annual limits and research on officer fatigue. We found that most SDPD officers did not work excessive overtime hours. However, in FY2023, 50 officers (3 percent) each worked more than 1,000 overtime hours in one year, totaling nearly 65,000 total hours of overtime for just those officers. That equates to an average of 65 hours of total work per officer, per week, every week of the year. These officers worked about 7 times more overtime hours than the median officer.

Exhibit 3 also demonstrates that three officers worked more than 2,000 overtime hours in FY2023. Allowing officers to work a total of nearly 90 hours per week, every week of the year leads to even higher risk of fatigue and exemplifies the necessity for increased oversight of overtime. The officers working excessive overtime were primarily working Patrol and Neighborhood Policing shifts, meaning they were patrolling the City's neighborhoods, responding to calls, interacting with the public, and connecting people experiencing homelessness with services.

Officers working excessive overtime increases risks to both officer and public safety due to fatigue.

Working long hours can have negative consequences for officer safety and effectiveness. According to research published by the US Department of Justice, the FBI, and the International Association of Chiefs of Police, working while fatigued can lead to accidents and injuries, as well as reduce cognitive performance and communication abilities. Officers working excessive overtime are likely to be fatigued, increasing the risk of injury to themselves or others. The standard shift at SDPD is 10 hours.¹ According to the US Department of Justice's National Institute of Justice Journal, although low overall, the risk of accidental officer death increases considerably after an officer has been on duty 10 hours or more. After 10 hours on duty, the risk of accidental officer death increases by 90 percent compared to the risk of 8 hours on duty. After 12 hours, the risk increases by 110 percent.

Fatigued officers can also negatively affect public safety. According to

¹ According to SDPD, many police departments' standard shift for officers is 12 hours.

Fatigue can create an inability to accurately assess risks and predict consequences, skills necessary for effective police work.

the FBI, fatigue can create an inability to accurately assess risks and predict consequences, control mood and behavior, and communicate effectively. These are all skills necessary for effective police work. The US Department of Justice's National Institute of Justice Journal also states that being awake for 19 hours creates impairments that are comparable to having a blood alcohol content of 0.05 percent.

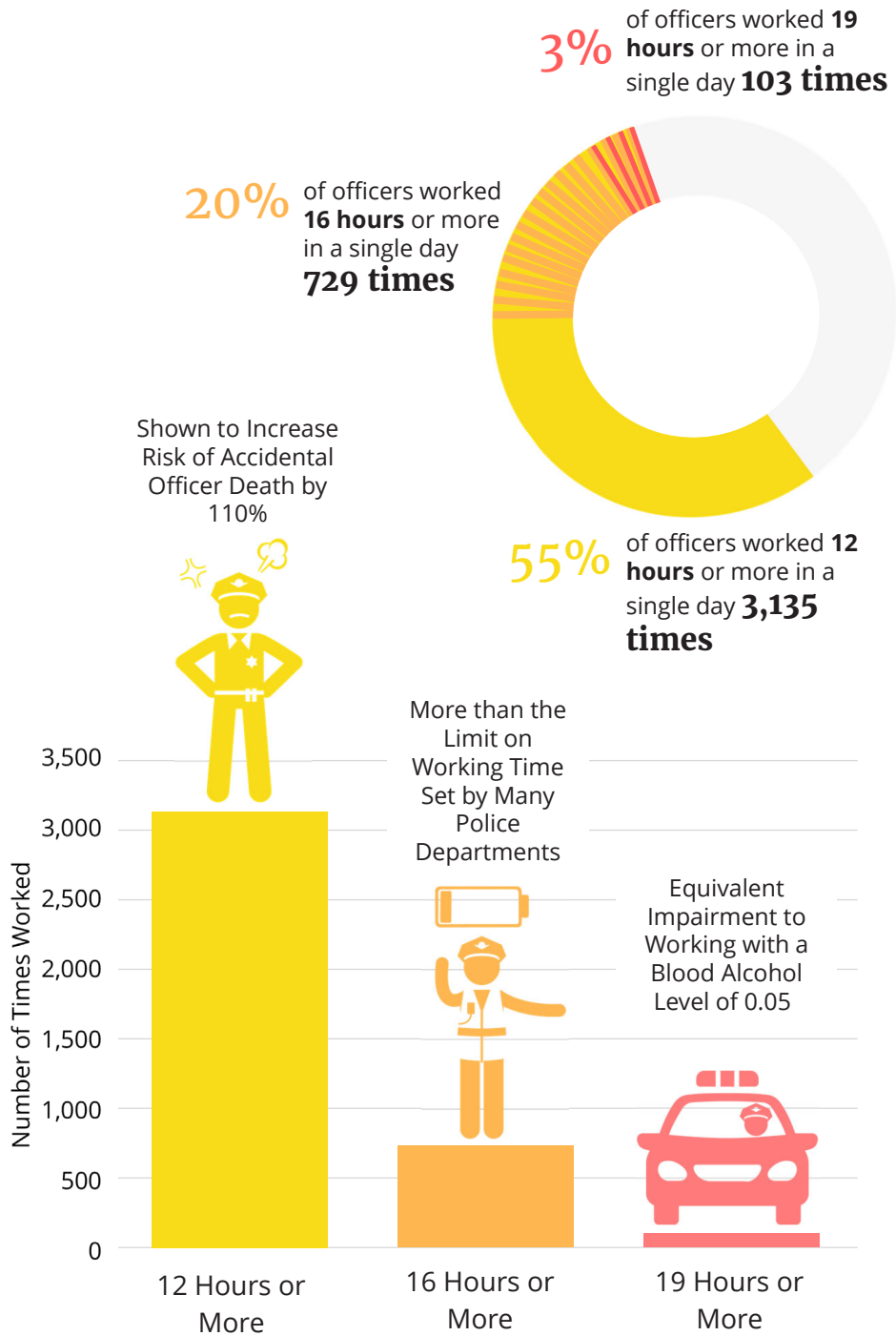
Despite these risks, as illustrated by **Exhibit 4**, we found that in April 2023, 960 officers (55 percent) worked 12 or more hours in a single day at least once.^{2: 3} Over the month, 343 officers (20 percent) worked 16 or more hours in a single day, and 61 officers (3 percent) worked 19 or more hours in a single day. The risk posed by officers working more than 19 hours in a day is likely understated here, given that the study states the risk of being awake for more than 19 hours, while our data captures the number of officers working for 19 hours. If the officers were working for 19 hours, they were likely awake for even longer.

2 Referred to as "April 2023" throughout this section, but is specifically April 1, 2023 to April 28, 2023, the dates of the two pay periods in April 2023. April 2023 was selected for sampling as a recent month with reconciled payroll data and with no major holidays requiring longer shifts.

3 Per the City's Personnel Manual, sworn officers who are eligible for premium rate overtime at SDPD include Police Detectives, Officers, Sergeants, and Recruits. Our analysis included only officers eligible for overtime.

Exhibit 4

In April 2023, a Significant Portion of SDPD Officers Worked More Hours in a Single Day Than Best Practices Recommend



Source: OCA generated based on payroll data from SAP, research published in the US Department of Justice's National Institute of Justice Journal and FBI Law Enforcement Bulletin, and publicly available overtime policies from comparable cities' police departments.

SDPD does not limit excessive overtime.

SDPD does not limit overtime, increasing risks to officers and the public due to officer fatigue. To monitor overtime hours, SDPD uses the Early Identification and Intervention System (EIS) to alert when an officer logs at least 60 overtime hours in a 2-week pay period twice in row. However, the system is retrospective and is not designed to limit excessive overtime. SDPD encourages officers to take an 8-hour break between shifts, but it is an informal policy and is not monitored.

One officer worked 439 total hours in the month, averaging nearly 16 hours per day, 7 days a week.

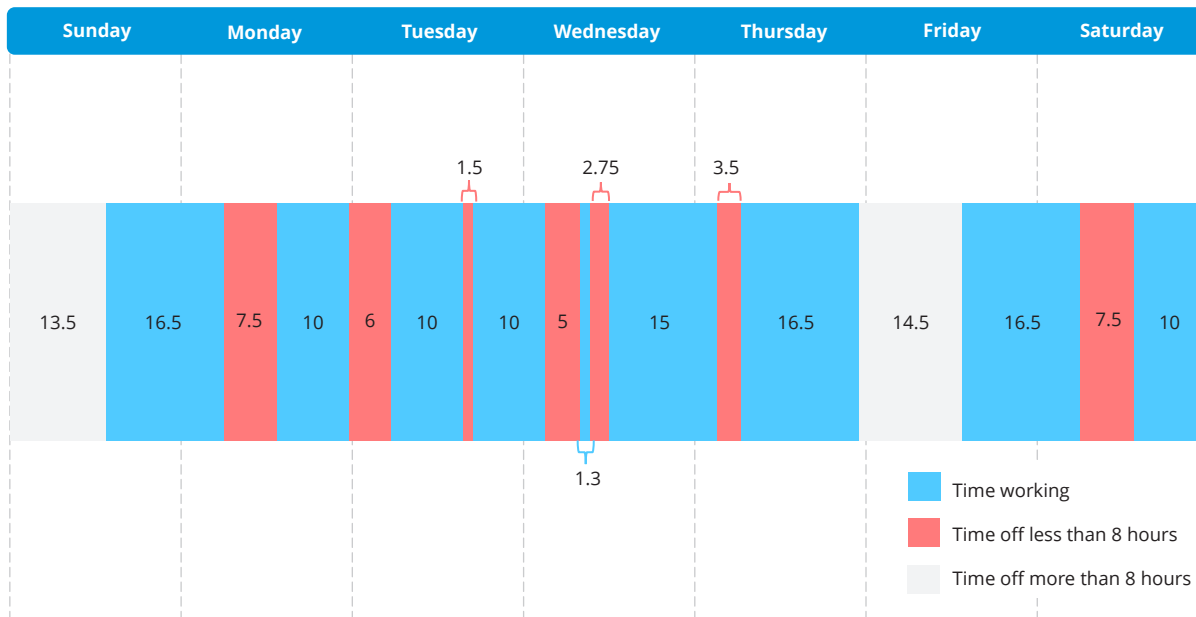
We analyzed hours worked by officers in May 2023, and found multiple examples in just one month of officers working excessive hours and taking very limited breaks.⁴ In one example, one officer worked 439 total hours in the month, averaging nearly 16 hours per day, 7 days a week. In one 3-day stretch, the officer worked two 10-hour shifts, took a 5-hour break, went to court, took a 3-hour break, and then worked a 15-hour shift, took a 4-hour break, and worked 17 more hours. That is 53 hours of work from Tuesday through Thursday with a total of just 19 hours off, as illustrated in **Exhibit 5**. In another example, a different officer worked 355 total hours in May 2023, averaging nearly 13 hours per day. During the timeframe, this officer worked with 8 consecutive hours or less of time off per day for as many as 3 days in a row.

⁴ Referred to as “May 2023” throughout this section, but is specifically April 29, 2023 to May 26, 2023, the dates of the two pay periods in May 2023. May 2023 was selected for sampling as a recent month with reconciled payroll data and with no major holidays or events except Memorial Day.

Exhibit 5

An Officer Worked 7 Shifts with Less Than an 8-Hour Break in One Week

7-Day Work Week in Hours, May 2023



Source: OCA generated based on payroll data from SAP and overtime authorization forms.

Many police departments limit total hours worked per day or per week, but SDPD does not.

The work hours in many professions, for example airline pilots and truck drivers, are standardized and regulated to ensure safety for workers, customers, and others on the road. There is no such national standard for police officers. In the absence of a national standard, some departments have implemented their own limits to reduce officer accidents and injuries, and maintain performance and quality service levels, as shown in **Exhibit 6**. Of the 21 police departments we reviewed in comparable cities and the San Diego region, we found 11 had a limit on overtime hours worked or had a required break. Some of these cities, such as San Jose, are staffed similarly to SDPD, but still impose limits on daily or weekly hours worked.⁵

⁵ For example, the City of San Jose staffed 1.1 officers per 1,000 residents and the City of Sacramento staffed 1.3 officers per 1,000 residents, similar to the City of San Diego’s 1.3 officers per 1,000 residents. However, both cities limit the overtime their officers work, while San Diego does not. This data is from FY2021, the most recent available data from the FBI Crime Data Explorer.

Exhibit 6
Many Police Departments Limit the Total Hours Officers Can Work in a Day or Week

Location	Daily Limit of Total Working Hours (in hours)	Weekly Limit of Total Working Hours (in hours)	Other or Notes
San Diego, California	n/a	n/a	Encourages 8-hour break between shifts
Austin, Texas	16	76	
Dallas, Texas	16	80	
Fresno, California	n/a	70	Requires 1 day off per week
Oakland, California	n/a	64	Requires 1 day off per week
Sacramento, California	16*	60*	
San Francisco, California	16	60	
San Jose, California	16	70	
Seattle, Washington	18	90	
Carlsbad, California	16	84	Prohibits working more than 30 total hours in 2 days
Coronado, California	16	84	Prohibits working more than 30 total hours in 2 days
National City, California	16	84	Prohibits working more than 30 total hours in 2 days

*Totals include limits on off-duty employment and backfill overtime only.

Note: Some department limits include exceptions, such as if working more hours is approved or directed by a chief or designee, or if hours are for court overtime or waiting for an end-of-shift replacement.

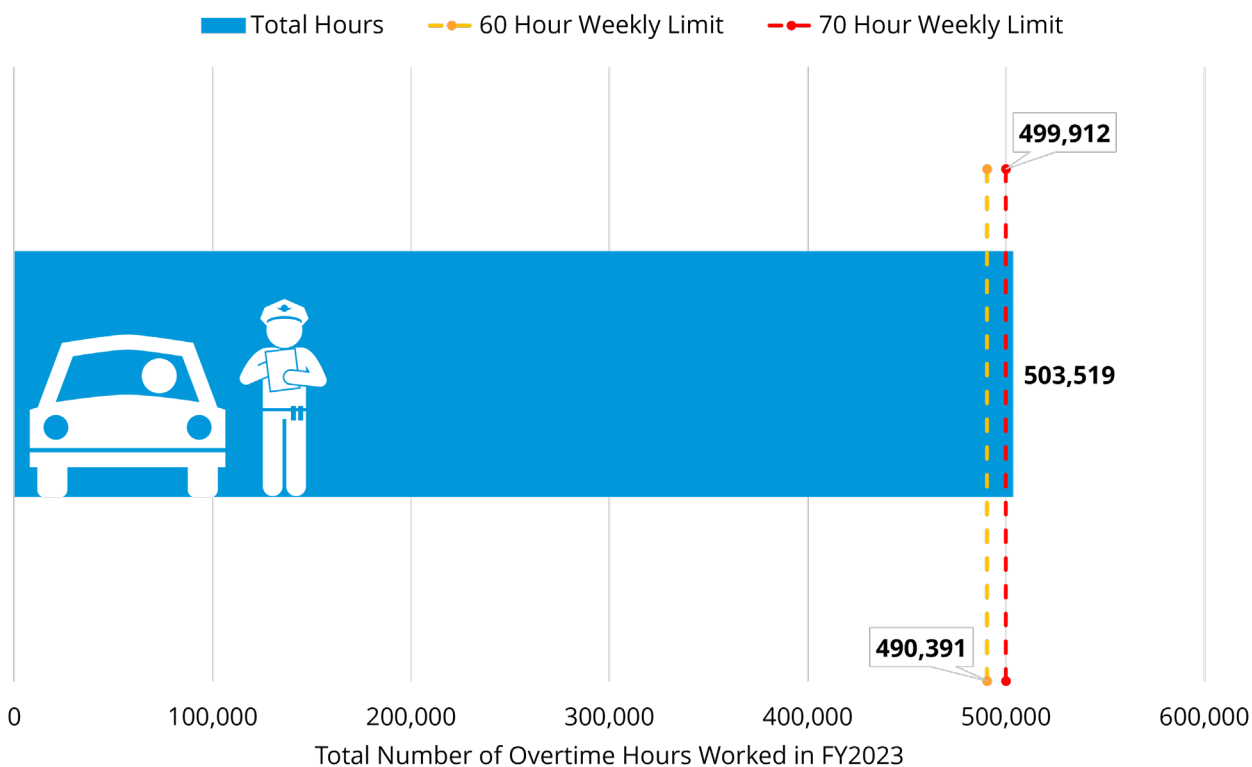
Source: OCA generated based on publicly available information from each city and the 2022 Honolulu Police Department Overtime Audit.

Limiting excessive overtime would limit officers responding to calls but could increase officer and public safety by minimizing officer fatigue.

While relatively few officers would be impacted by SDPD adopting policies to manage fatigue, such policies would reduce the safety risks associated with officers working high amounts of overtime for both the officers and the public. As shown in **Exhibit 7**, we found that limiting officers to 60 hours of total work per week in FY2023 would have likely decreased the overtime hours worked by 2.6 percent. If SDPD limited officers to 70 hours of total work per week, total overtime hours worked would have likely been reduced by 0.7 percent. These small percentages indicate that overtime limits could have relatively minimal operational impacts on SDPD. However, according to SDPD, those hours represent work that is necessary for public safety and would have needed to be done regardless of an overtime limit.

Exhibit 7

Limiting Weekly Work to 60 Hours Would Have Likely Decreased Overtime Hours in FY2023 by Less Than 3%

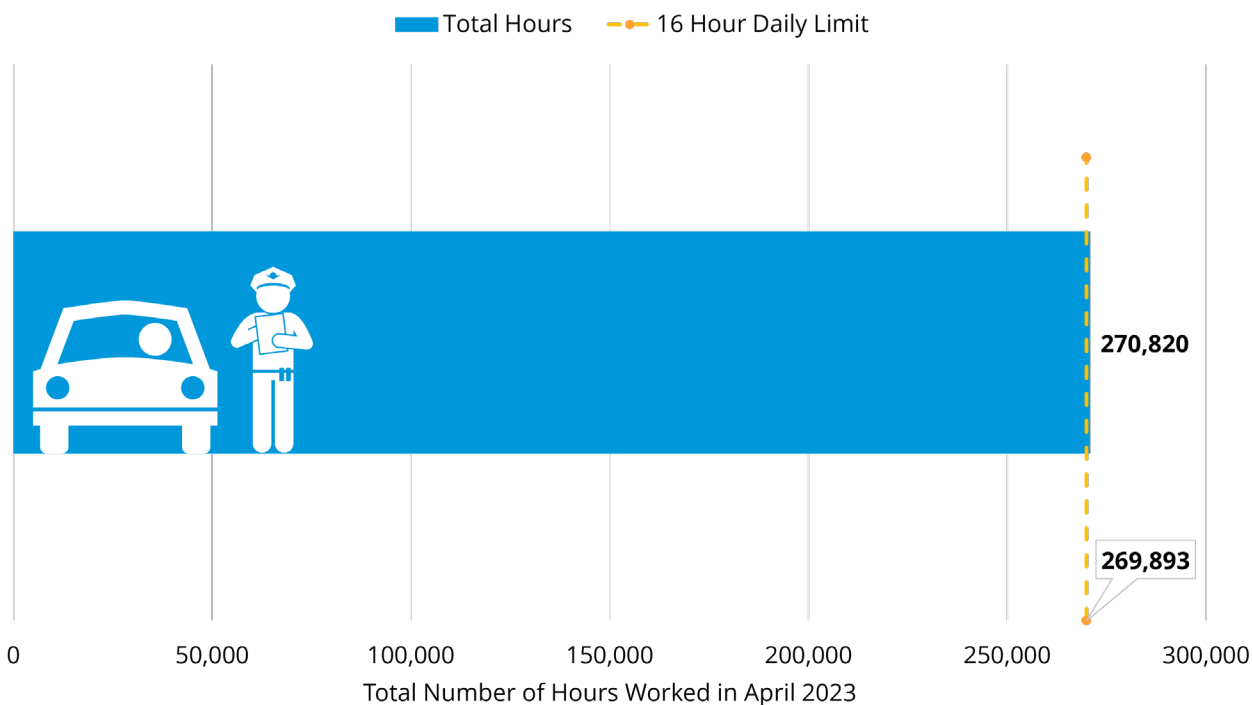


Source: OCA generated based on payroll data from SAP.

If SDPD imposed a daily limit of hours worked for officers, we found that the limit could reduce hours worked by officers in a month by approximately 0.3 percent. For example, in April 2023,⁶ officers eligible for overtime worked 270,820 total hours. As shown in **Exhibit 8**, limiting daily work for those officers to 16 hours would have decreased the total hours worked in April 2023 by 927 hours (0.3 percent). Limiting daily work to 19 hours in April 2023 would have decreased total time worked by officers eligible for overtime by 171 hours (0.1 percent).

Exhibit 8

Limiting Daily Work to 16 Hours Would Have Decreased Overall Working Hours in April 2023 by Less Than 1%



Source: OCA generated based on payroll data from SAP.

⁶ The two pay periods in April, from April 1, 2023 to April 28, 2023.

With limited staffing resources, SDPD should consider prioritizing specific overtime needs and centralizing oversight.

By prioritizing overtime shifts based on need, SDPD can ensure that overtime costs have the greatest public safety benefit.

We found that some SDPD officers are working excessive overtime to meet staffing needs, but officers may not be working overtime shifts in the areas of greatest need. According to SDPD, there are overtime shifts that are not filled. Overtime at SDPD is voluntary and assigned on a first come, first served basis. Each division at SDPD competes equally for officers to volunteer for available overtime shifts. This means officers can choose where they would like to work an overtime shift, even if other assignments more urgently need officers. Given SDPD's limited number of officers, SDPD should consider ordering its overtime shifts by priority so that higher priority shifts are filled first. By centralizing overtime management and prioritizing overtime shifts based on need, SDPD can ensure that the approximately \$50 million a year the City spends on police overtime has the greatest public safety benefit.

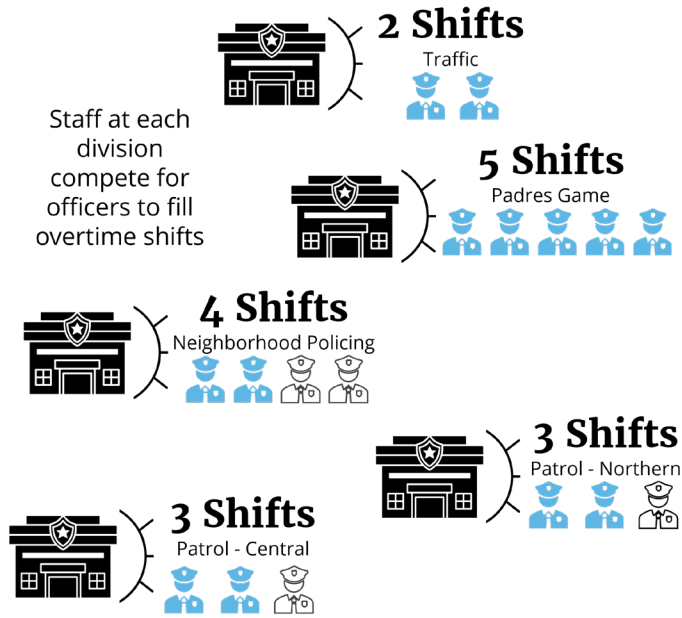
According to the San Diego Police Officers Association, prioritizing overtime staffing and centralizing overtime allocations would likely reduce the burden to find overtime shift volunteers. For example, according to SDPD, each SDPD division manages its overtime hours and shifts in its own database. A system could be put in place to allow those databases to communicate. According to SDPD, it has considered prioritizing overtime in the past to reduce overtime costs and streamline overtime processes, but would need additional staffing and resources to do so.

One example of how SDPD could manage overtime is to prioritize certain overtime shifts over others and create a central point of contact that oversees all available overtime opportunities. **Exhibit 9** shows the current sign-up process if there were available overtime shifts in the Central, Northern, and Traffic Divisions, Neighborhood Policing, and Padres games, and what the sign-up process could be like in a central, prioritized system. Instead of an officer in each division managing and offering overtime shifts separately, officers could sign up for their preference of any of the available overtime shifts, with the understanding that if they sign up for a lower priority shift, as determined by SDPD, and a higher priority shift is available, they may be reassigned and notified before the shift.

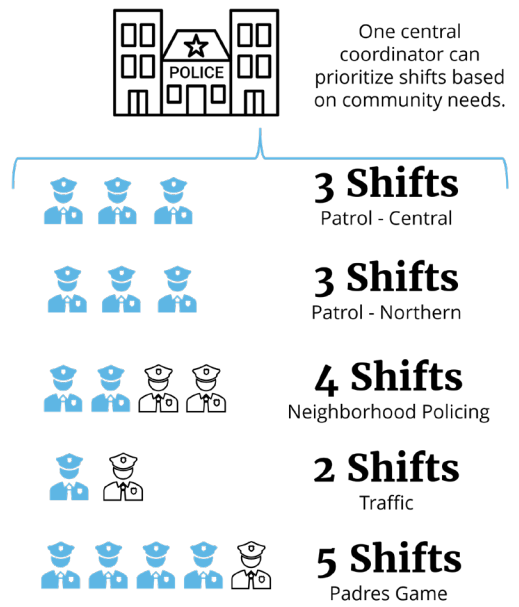
Exhibit 9

A Centralized Overtime System Could Ensure Priority Shifts Are Filled First

Existing Decentralized Sign-Up Process Could Result in Unfilled High-Priority Overtime Shifts



Theoretical Centralized Sign-Up Process Would Fill Overtime Shifts by Priority First



Note: Specific prioritization shown on the right is for example purposes only.

Source: OCA generated based on interviews with SDPD and the San Diego Police Officers Association.

A central point of contact for overtime could also help SDPD enforce overtime limits, coordinate when officers are needed last minute, and monitor the risks of working excessive hours. Rather than having sign-ups distributed across different divisions, the central point of contact could identify when officers sign up for excessive overtime across different divisions. The central point of contact would also have one record of where each officer is working, reducing the coordination necessary to identify available officers if a high priority shift is unfilled.

Recommendations

To increase officer safety and reduce the risk posed by officers working excessive overtime hours, we recommend:

Recommendation 1.1

(Priority 1)

The San Diego Police Department (SDPD) should amend its applicable policies and procedures to require officers take an 8-hour break between shifts. SDPD should clearly define what constitutes a “shift,” and should clarify the specific situations that would merit an officer not taking an 8-hour break between shifts, such as officers approved to extend their current shift, a necessary court appearance, a call-back that has been approved in accordance with policy, or an emergency situation.

Management Response: Agree. [See full response beginning on page 43.]

Target Implementation Date: December 2025

Recommendation 1.2

(Priority 2)

We recognize the San Diego Police Department (SDPD) is working with limited staffing resources and overtime is necessary, but SDPD could prioritize its needs to ensure staffing levels are highest where the needs are greatest. To do so, we recommend:

- a. SDPD should prioritize its overtime allocation, potentially through a central overtime function. If additional resources are necessary to implement this recommendation, SDPD should present those needs to the City Council and its relevant committees.
- b. Once overtime allocation is prioritized, SDPD should review its applicable policies and procedures to determine if it should set a limit on the maximum number of hours officers can work in a day and a rolling week to ensure officer and public safety. To determine if a limit is necessary and the appropriate limit, SDPD should consider the available research on the increased risks of long shifts and repeated long shifts. However, due to the nature of public safety work, SDPD should also clarify in its policies and procedures the specific circumstances in which an officer would be allowed to

work more hours than the policies allow. SDPD should present the results of its review and determination on whether or not to set a limit, and what the limit should be, to the appropriate City Council committee.

Management Response: Agree. [See full response beginning on page 44.]

Target Implementation Date: December 2025

Recommendation 1.3

(Priority 2)

The San Diego Police Department (SDPD) should operationalize Recommendations 1.1 and 1.2 by setting notifications in SAP and/or the payroll review process to ensure the total number of hours worked in a day and a rolling week does not exceed the maximums set by SDPD policies and procedures. The oversight in SAP and/or the payroll review process should also determine when officers have failed to take the required 8-hour consecutive time off between shifts. SDPD should amend its applicable policies and procedures to include who will monitor this notification and raise the issue to the relevant supervisors, including processes for addressing violations and a policy for exceptions.

Management Response: Agree. [See full response beginning on page 44.]

Target Implementation Date: December 2025

Finding 2

While SDPD overtime spending is in line with other police departments, more civilian positions could help reduce overtime costs and improve response times.

Finding Summary

The San Diego Police Department (SDPD) has been under scrutiny for consistently spending more on overtime than budgeted. However, when we investigated the reason behind the overtime spending, we found that overtime spending is primarily driven by SDPD's staffing needs. SDPD has struggled to hire and retain officers, so SDPD asks the officers it has to work overtime to meet the City's public safety needs. As a result, SDPD's overtime hours and overtime costs have increased over the last 5 years. However, even with officers working increased overtime, the time it takes SDPD to respond to calls for service has generally increased since fiscal year (FY) 2019 and it still takes officers longer to respond than SDPD's targeted response times. Therefore, officers working overtime are unlikely to fully address SDPD's needs. To meet SDPD's service level plans and to reduce overtime spending, ultimately the City needs to develop strategies to hire and retain more officers. Hiring and retaining officers is largely outside of the scope of this audit, but according to SDPD, strategies are in place to address some of these root cause issues.

To make best use of SDPD's existing officers, we recommend SDPD determine what work currently done by officers could be done by civilian staff. We found that about 13 percent of calls for police services could have been responded to by one type of civilian position, while that position represents just 1.4 percent of the budgeted police staffing. We make recommendations in both this finding and Finding 1 to reduce the risks and costs of overtime, but many of the overtime costs are likely to remain unless hiring and retention issues are addressed.

When reviewing SDPD's overtime costs, we also found that the City is not unique in its hiring and retention issues with police officers. Other cities in California are facing the same concerns. SDPD's overtime costs, while above what the City planned to spend, are in line with overtime spending at other comparable cities in the region and across the country. It is unclear whether overtime spending is more or less expensive than hiring additional staff,⁷ but since SDPD is struggling to hire enough officers to meet even its minimum staffing needs, some overtime is necessary for the time being regardless of cost for the City to continue to respond to calls for service.

⁷ The Department of Finance has conducted and presented an analysis on this topic but is still revising its methodology.

SDPD overtime costs are primarily due to staffing needs.

The two largest categories of police officer overtime in FY2023 were dedicated to patrol backfill and extension of shift, as shown in **Exhibit 10**. Both categories are related to staffing needs. In order to respond to calls in a timely manner and to meet public safety needs 365 days a year, SDPD sets minimum required staffing levels for each patrol shift and each area of the City.⁸

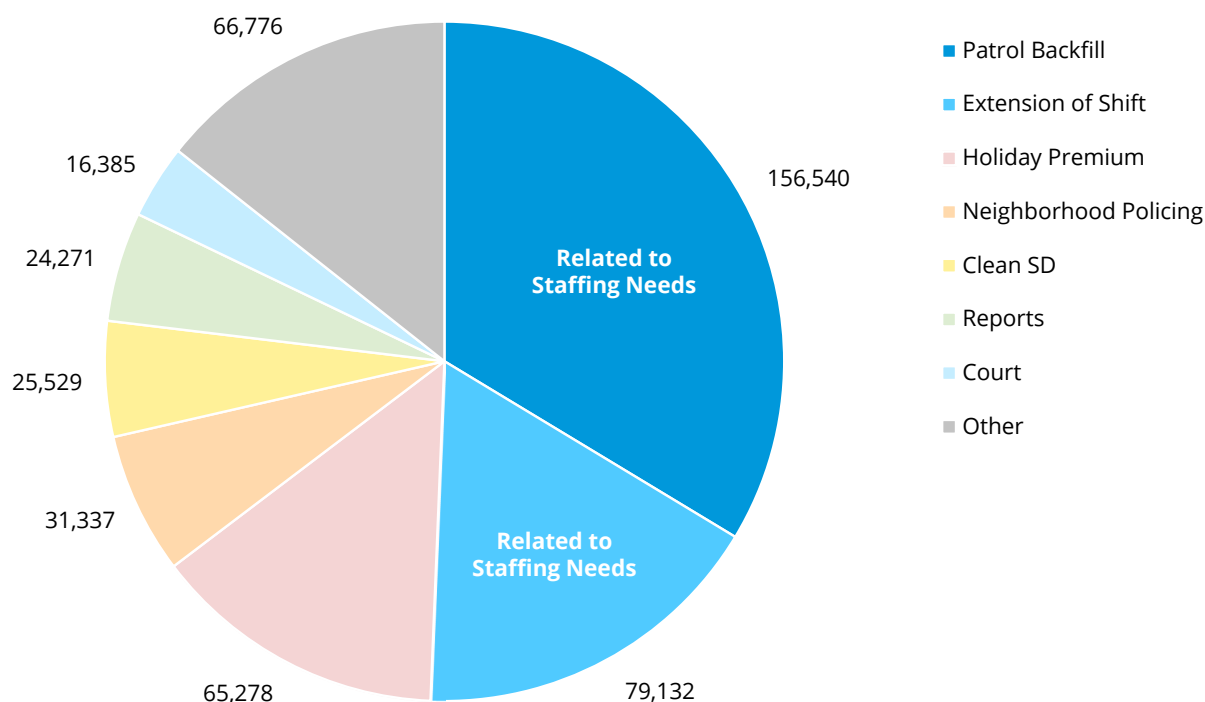
If officers are not available to respond to calls, there may be impacts to public safety and an increase in citizen complaints. When staffing levels are not met due to vacancies, sick officers, or other circumstances, overtime is used to fill gaps. Patrol backfill is used when a patrol area command does not meet its minimum staffing requirement. Extension of shift is used when officers need to continue working to respond to calls or emergency situations or otherwise need to extend their shift as required by SDPD.

⁸ SDPD uses a staffing model to determine the necessary staff for each patrol shift and beat. In FY2014, the Office of the City Auditor recommended that SDPD analyze dispatch data to refine its staffing model. In 2020, SDPD implemented this recommendation. As such, we excluded the staffing model from this audit.

Exhibit 10

The Two Largest Categories of Overtime Costs and Hours are Primarily Dedicated to Meeting Staffing Needs

Top Overtime Shift Types by Number of Hours, FY2023



Note: The “Other” category includes shifts such as Community Policing Extension of Shift, grant-funded traffic and driving education, COVID-19 related tasks, task forces, and other reimbursable or grant-funded activities.

Source: OCA generated based on payroll data from SAP.

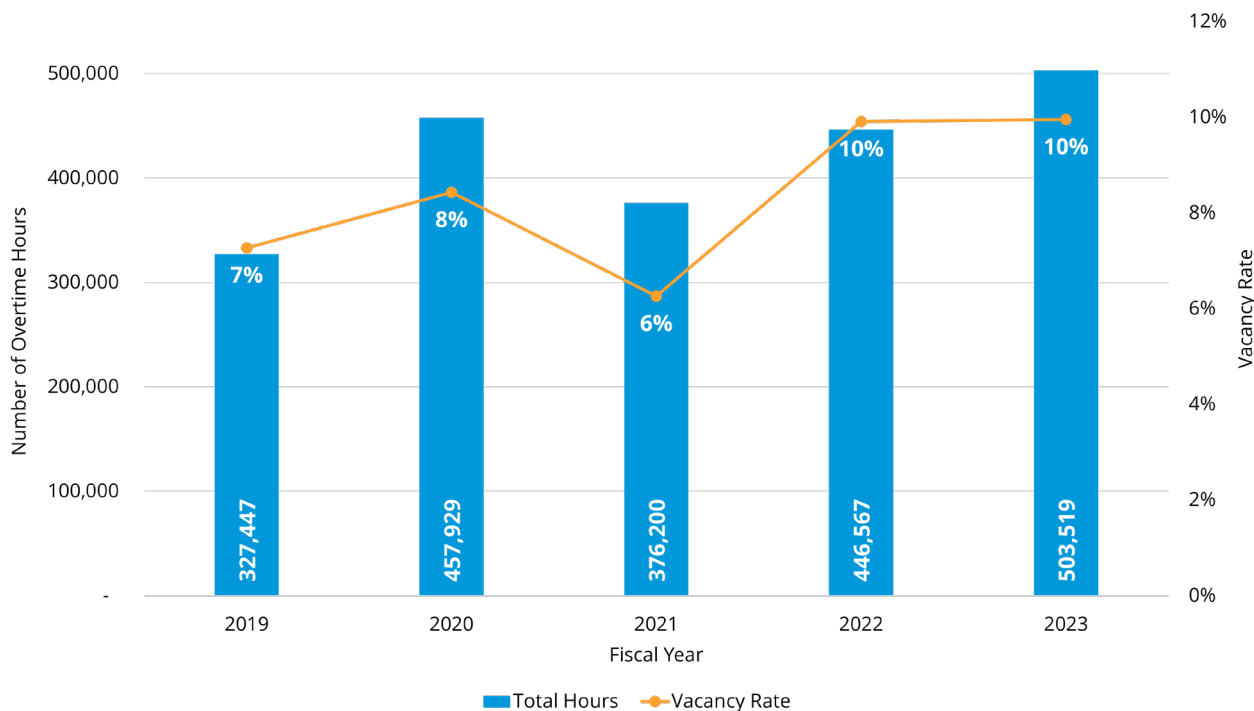
Understaffing as a cause of overtime costs is not unique to SDPD. We found understaffing was a key factor in overtime costs for 8 out of 11 comparable police departments we reviewed. For example, in April 2023, the Los Angeles Police Department requested funds for both additional sworn and civilian staff to reduce response times. The request acknowledges a struggle to recruit officers in a tight job market—a struggle SDPD faces as well.

Overtime hours worked by officers increased as vacancy rates generally increased.

Vacancy rates among police officers increased from 7 percent in FY2019 to 10 percent in FY2022 and FY2023, as illustrated in **Exhibit 11**. At the same time, the number of overtime hours worked by officers increased by 54 percent, from about 330,000 hours in FY2019 to more than 500,000 hours in FY2023. According to SDPD, in late 2020, it started not meeting minimum staffing levels and needing more overtime hours due to officers retiring or leaving for other agencies, staffing impacts from COVID-19 and the vaccine mandate, and an increase in homelessness-related calls for service. SDPD also attributes the increase in overtime to an increase in required documentation time due to new administrative requirements. Overtime hours have generally increased since FY2019, as shown in **Exhibit 11**.

Exhibit 11

The Officer Vacancy Rate at SDPD Has Generally Increased, While the Number of Overtime Hours Officers Worked Increased by More Than 50 Percent from FY2019 to FY2023



Source: OCA generated based on payroll, personnel, and budget data from SAP.

SDPD response times have largely increased since FY2019, even with increased overtime.

Response times generally increased from FY2019 to FY2023, as shown in **Exhibit 12**. According to SDPD, this is largely due to increased officer vacancies. However, officers worked overtime to fill some of the vacant shifts. Increasing response times together with increasing overtime highlight the fact that some overtime shifts remain unfilled. Therefore, many of the costs and impacts of overtime will not be addressed until hiring and retention issues are addressed. At the same time, other issues may also contribute to response times, such as civilian staffing needs and, according to SDPD, increased administrative demands on officers.

Exhibit 12

SDPD Response Times for Priority 1, 2, and 3 Calls Have Increased in Recent Years

Call Priority	Description	Goal Response Time	FY2019 Response Time	FY2023 Response Time
Priority 0	Calls that involve an imminent threat to life (such as an officer/person down or an attempted suicide).	7 minutes	6.7 minutes	6.5 minutes
Priority 1	Calls that involve serious crimes in progress or a threat to life (such as missing children, domestic violence, or disturbances involving weapons).	14 minutes	22.5 minutes	33.3 minutes
Priority 2	Calls that involve complaints regarding less serious crimes in which there is no threat to life (such as prowlers who have left, injured animals, or loud parties with mitigating circumstances).	27 minutes	60.6 minutes	103.3 minutes
Priority 3	Calls that involve minor crimes or requests for service which are not urgent (such as investigating a cold crime or loud parties involving noise only).	80 minutes	101 minutes	159.6 minutes
Priority 4	Calls that involve minor requests for police service (such as found property or parking violations).	90 minutes	103.1 minutes	95.5 minutes

Note: In FY2019, Priority 0 calls were referred to as Priority E calls in SDPD's adopted budget.

Source: OCA generated based on SDPD FY2019 and FY2024 Adopted Budgets and the [SDPD Dispatch Priority System](#).

Hiring more civilian employees who do administrative work and respond to lower-risk calls may reduce overtime and improve response times.

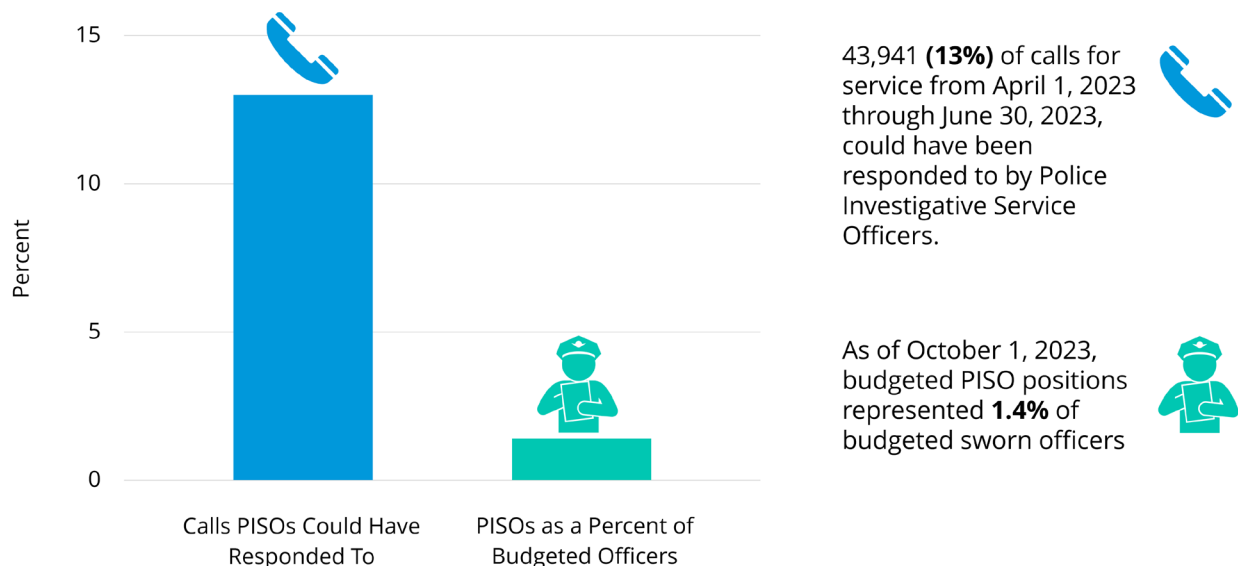
Civilianization is likely to reduce response times by freeing up officers for higher priority emergency calls.

Civilianization is likely to reduce response times by freeing up officers for higher priority emergency calls. Civilianization generally means shifting some administrative, investigative, and reporting work from sworn officers to civilian employees in police departments. SDPD has a number of civilian roles that support police work. For just one civilian role, Police Investigative Service Officers (PISOs),⁹ we found approximately 13 percent of SDPD's calls for service could have been addressed by these civilian workers instead of sworn officers. However, as shown in **Exhibit 13**, budgeted PISO positions currently represent only about 1.4 percent of SDPD's budgeted sworn officer staffing, resulting in sworn officers responding to some of those calls. According to SDPD, PISOs are important to free up sworn officers to move on to higher-priority calls when needed and to increase the amount of time available for proactive policing to reduce crime in neighborhoods. Similarly, the International Association of Police Chiefs states in their model civilianization policy that when civilians are used for selected functions that do not require the authority of a commissioned officer, sworn personnel are freed to conduct enforcement functions. In addition to ensuring officers are assigned the most important shifts, as discussed in Finding 1 with prioritizing and centralizing overtime, civilianization could also allow officers to focus on responding to the calls that most require sworn officers.

⁹ PISOs can respond to radio calls where there is no expectation of confrontation or probability that a suspect will return to the scene, such as injury, hit and run, or auto theft. They complete field training and do not carry weapons.

Exhibit 13

From April through June 2023, PISOs Could Have Addressed 13% of Calls for Service, But SDPD Has Relatively Few PISOs



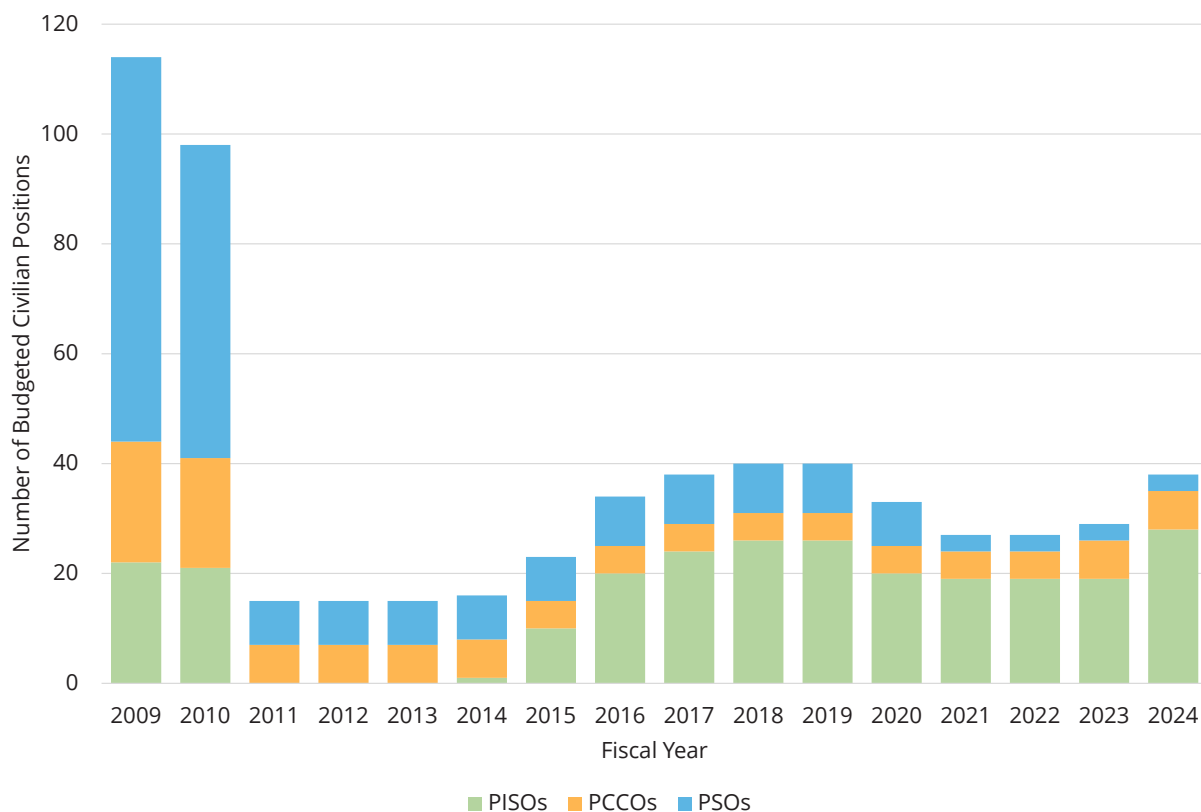
Source: OCA generated based on dispatch data and payroll data from SAP.

Examples of civilian roles at SDPD that support sworn officers by performing investigative work and administrative duties are PISOs, Public Code Compliance Officers (PCCOs), and Police Service Officers (PSOs). PISOs can respond to radio calls where there is no expectation of confrontation or probability that a suspect will return to the scene. PCCOs conduct field investigations in the enforcement of City Codes and Ordinances related to police-regulated businesses and PSOs perform routine community service and non-hazardous police functions.

All three of these civilian positions were cut drastically in FY2011, decreasing the number of PISOs from 21 to 0 and reducing the total number of these three positions by 85 percent. SDPD has repeatedly requested additional civilian positions and the number of budgeted PISOs has slowly increased since 2011, totaling 28 in FY2024. **Exhibit 14** shows the decrease and slow rise in budgeted PISOs, PCCOs, and PSOs since FY2009. Although SDPD requested 20 additional PISO positions for the FY2024 budget, it received only 10 additional PISO positions.

Exhibit 14

In Total, Civilian Roles Like PISOs at SDPD Have Not Returned to FY2009 Levels



Source: OCA generated based on SDPD adopted budgets.

SDPD, the San Diego Police Officers Association, San Diego Municipal Employees Association, Los Angeles Police Department, the Los Angeles police officers’ union, and other groups have advocated for increased use of civilian employees to reduce some of the demand on officers’ time and reduce costs as hiring and retaining officers becomes more challenging. In March 2023, the Los Angeles police officers’ union proposed that 28 types of 911 calls be responded to by civilian staff rather than sworn police officers. The union argued that this change would allow police officers to respond quicker to other emergencies, engage in community policing, and increase crime clearance rates. In addition, other city audit offices, such as Los Angeles and San Jose, have recommended civilianization to reduce costs and maximize resources. Both the Los Angeles Police Department and the San Jose Police Department agreed to the recommendations.

Increasing the number of civilian employees may decrease department expenditures.

Civilianization is also likely to reduce costs for police departments because sworn officers are paid more than civilian staff. Per the City's job opportunities website, we found that an entry level PISO salary was 26–36 percent lower than a Police Recruit salary and 37–43 percent lower than a Police Officer I salary.¹⁰

The Office of the Independent Budget Analyst (IBA) has also historically raised concerns about eliminating civilian positions due to the potential for increased response times and costs. In its 2009, 2011, 2012, and 2013 reviews of the proposed budget, the IBA stated that eliminating civilian positions would likely increase sworn overtime, increase response times due to the loss of officer time in the field, and may increase costs to the public.¹¹ The IBA warned against potential negative impacts of eliminating civilian positions on police administration and case backlog. The IBA also warned that eliminating civilian positions would likely increase costs for tasks previously done by civilian personnel, since sworn personnel typically have higher salaries than civilians.

SDPD can strengthen its analysis on how many Police Investigative Service Officers or similar civilian positions would be necessary to maximize resources.

SDPD has requested and received budget for additional PISOs in recent years, although it has not always received the number of positions it requested. In 2022, SDPD assessed the PISO program and structure, concluding 40 to 60 additional PISOs were necessary for the structure. This analysis did not appear to consider the ideal civilian support staffing level across all the civilian positions similar to PISOs or the potential benefits to sworn officer service levels and overtime. As mentioned, we found PISOs alone could have responded to 13 percent of calls from April through June 2023—meaning far more PISOs could potentially be used than the 40 to 60 SDPD concluded would be appropriate for the proposed new PISO structure.¹² Including this data and presenting the assessment for PISOs and all similar positions would provide better information for the Mayor and City Council when making budget decisions.

¹⁰ Salary information is as of January 4, 2024.

¹¹ The links to the IBA Budget Review reports are provided here and can be located on the IBA's website: [2009 Report](#), [2011 Report](#), [2012 Report](#), and [2013 Report](#).

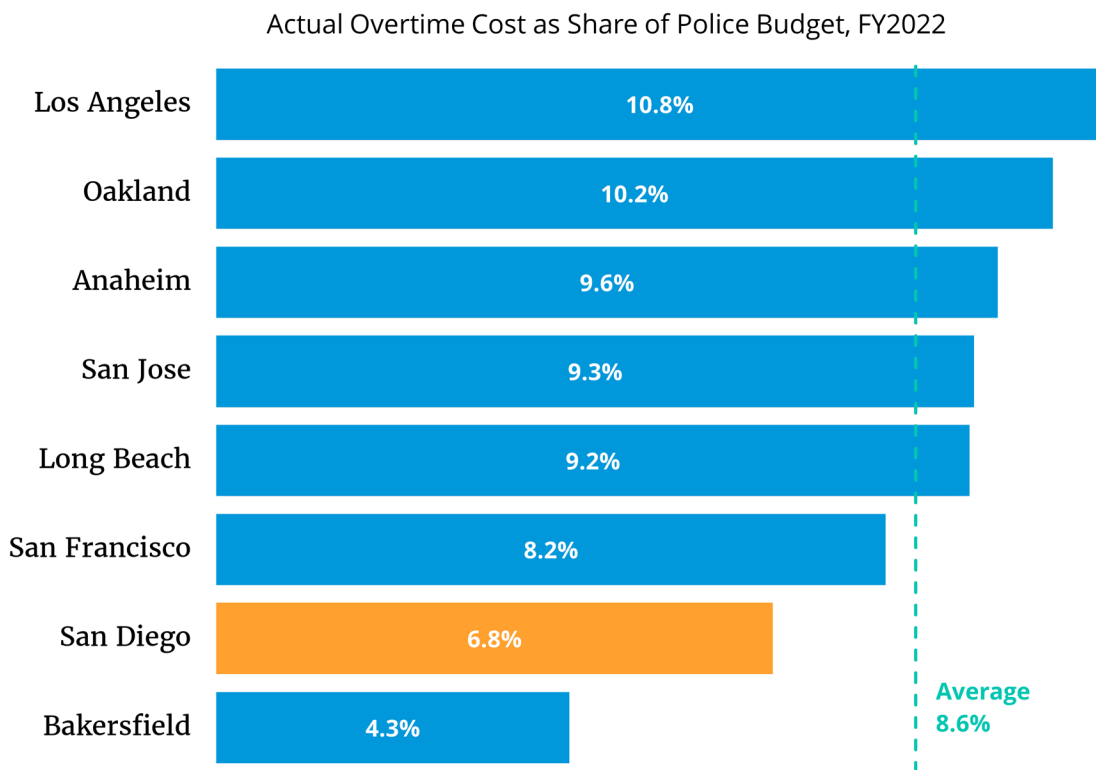
¹² For example, in October 2023 SDPD had approximately 1,800 sworn officers and 13 percent of 1,800 officers would be 234 PISOs.

SDPD’s overtime costs are in line with other cities’ spending.

Other cities in California are facing the same hiring and retention concerns as SDPD. We reviewed actual overtime costs as a percent of the total police department budget for the top 10 largest cities in California and other police departments in San Diego County.¹³ We found that SDPD’s overtime costs were about average. **Exhibit 15** illustrates that in FY2022, SDPD spent 6.8 percent of its budget on overtime, which is below the average for comparable cities in California. We also found that SDPD spending was slightly above average compared to other police departments in San Diego County in FY2022. Taken together, while SDPD spent more money on overtime than budgeted, SDPD spending on overtime is in line with comparable cities in California and San Diego County.

Exhibit 15

SDPD Overtime Spending Was Below the Average for Large Cities in California in FY2022



Source: OCA generated based on publicly accessible city budgets and budget proposals.

¹³ Of the 10 largest cities in California, our report does not include Fresno and Sacramento because sufficiently detailed data on overtime spending was not available.

In FY2023, SDPD spent 9 percent of its actual budget on overtime. However, budget expenditures for FY2023 were not yet published for comparable cities and agencies, thus we were unable to review if SDPD overtime spending remains about average.

SDPD overtime spending is regularly overbudget.

Despite SDPD’s overtime spending being about average for comparable police departments, in almost every year from FY2013 to FY2023, SDPD spent more on overtime than budgeted, shown from FY2019 in **Exhibit 16**. FY2021 was the only year that SDPD overtime spending came in below budget, and was also the year in which SDPD’s officer vacancy rate reached its lowest point (6 percent). In addition, according to the Department of Finance, SDPD may not have exceeded the overtime budget in FY2021 because City Council added overtime reporting requirements. However, even with those requirements in place, SDPD resumed overspending on overtime in FY2022 as the officer vacancy rate also rose to 10 percent.

Exhibit 16

SDPD Consistently Underestimates Overtime Costs

Fiscal Year	Overtime Adopted Budget (millions)	Actual Overtime Expenditures (millions)	Overtime Percent Over/Under Budget (millions)	Adopted Total Budget (millions)	Actual Total Expenditures (millions)	Total Percent Over/Under Budget
2019	\$ 24.6	\$ 31.9	+30%	\$477.7	\$497.5	+4%
2020	\$ 36.9	\$ 44.8	+22%	\$547.1	\$619.8	+13%
2021	\$ 38.1	\$ 37.2	-2%	\$580.7	\$616.2	+6%
2022	\$ 30.7	\$ 40.9	+33%	\$601.2	\$609.3	+1%
2023	\$ 40.2	\$ 50.8	+27%	\$594.1	\$582.9	-2%
2024	\$ 49.3	TBD	TBD	\$628.1	TBD	TBD

Source: OCA generated based on SAP budget data.

SDPD and the Department of Finance are working to budget more accurately.

According to the Department of Finance, SDPD and the Department of Finance worked together to increase the overtime budget in FY2024 to reflect historical overtime actual spend more accurately. Salary savings due to vacancies were incorporated into the overtime budget projection for FY2024, which, according to the Department of Finance, was not the case in previous years. As SDPD and the Department of Finance are working to improve the budget projection process, we do not have any recommendations related to the overtime budget process.

Recommendations

Because SDPD spending on overtime is in line with comparable cities, and because SDPD and the Department of Finance reported using a more accurate methodology to estimate overtime spending in future years, we did not make any recommendations related to overtime budgeting. However, to potentially reduce overtime need and decrease police response times, we recommend:

Recommendation 2.1

(Priority 2)

The San Diego Police Department should conduct an analysis on how many Police Investigative Service Officers or similar civilian positions would be necessary to maximize civilian and sworn resources and present this analysis to the appropriate City Council committee.

Management Response: Agree. [See full response beginning on page 45.]

Target Implementation Date: December 2024

Finding 3

Overall, SDPD overtime tracking and authorization is accurate.

The vast majority of overtime authorization forms followed San Diego Police Department procedure.

To ensure compliance with San Diego Police Department (SDPD) overtime timekeeping procedures, we tested a statistical random sample of 126 overtime authorization forms and found that the information on the forms aligned with the information in SAP, and the vast majority of forms followed required SDPD procedures.¹⁴

100 percent of overtime shifts sampled had the required overtime authorization form. SDPD procedure requires officers to record their overtime shift in SAP and fill out a handwritten overtime authorization form, shown in **Exhibit 17**, for supervisor and payroll review. We found all overtime shifts in our sample had the required form, in compliance with SDPD procedure.

100 percent of overtime authorization forms sampled accurately recorded the overtime shift length and type of overtime shift. Supervisors and SDPD Payroll staff confirm the form is complete so that each officer is paid accurately for overtime worked. We found that all overtime authorization forms in our sample matched the information entered in SAP, the City's payroll system of record.

100 percent of overtime authorization forms sampled had legible supervisor personnel numbers. SDPD procedure requires supervisors to approve all overtime authorization forms by signing them and listing their personnel number so the supervisor's approval can be verified if necessary. We found that all forms in our sample included a legible supervisor personnel number.

97 percent of overtime authorization forms sampled were signed within 6 days of the overtime shift. SDPD procedure requires officers

¹⁴ We reviewed a random sample of all overtime authorization forms submitted by officers over the two pay periods in May 2023, from April 29 through May 30. We stratified the population into two samples to include officers who worked less than 1,000 overtime hours and those who worked 1,000 overtime hours or more, which we refer to as "working excessive overtime" in FY2023. The sample totaled 126 physical overtime authorization forms and had a 90 percent confidence level with an error rate of ± 10 percent.

to submit authorization forms for supervisor approval within 3 days of the overtime worked and supervisors to sign the forms within 3 days of submission, to ensure timely authorization and that supervisors monitor overtime use. We found that the vast majority of the forms in our sample were signed on time, in compliance with SDPD procedure.

Exhibit 17

SDPD Overtime Authorization Form

OVERTIME AUTHORIZATION							WHITE - PAYROLL COPY	CANARY - COMMAND COPY	PINK - EMPLOYEE COPY	PD-621 (REV. 8-17)PW/PS-191			
(PRINT) LAST NAME		FIRST	MI	RANK/CLASS	PD ID#	CITY ID# (PERNR)	DIVISION/ASSIGNMENT						
SHIFT HOURS		REGULAR DAYS OFF		ADJUSTED SHIFT (IF NEEDED)		DAY OF OVERTIME	DATE OF OVERTIME						
EXTENSION OF SHIFT OR PLANNED OVERTIME <input type="checkbox"/> 11001542 - Extension of Shift <input type="checkbox"/> 11003715 - Extension of Shift (Reports) <input type="checkbox"/> 11003719 - Extension of Shift (Training & Support) <input type="checkbox"/> 11003716 - Extension of Shift (Emergency Calls) <input type="checkbox"/> 11003746 - Extension of Shift (Community Policing)		EXPLANATION OF OVERTIME				OVERTIME WORKED		FROM: _____ TO: _____ (Use Military Time)					
COURT OVERTIME <input type="checkbox"/> 11001539 - City Attorney <input type="checkbox"/> 11001540 - Traffic <input type="checkbox"/> 11001541 - DA/Parole/Juvenile/Other						OVERTIME		HOURS		TENTHS			
SPECIAL EVENTS OVERTIME <input type="checkbox"/> 21002024 - Ballpark Events <input type="checkbox"/> 11001554 - Commercial <input type="checkbox"/> 11001555 - Nonprofit <input type="checkbox"/> 21003723 - Non-Charger Qualcomm Events						Actual Number of Hours Worked		_____		_____			
CALL BACK (Unplanned event) <input type="checkbox"/> 11003718 - Call Back						OVERTIME CARRIED AS:		<input type="checkbox"/> COMP		<input type="checkbox"/> PAY			
GRANT/TASK FORCE <input type="checkbox"/> _____ OTHER <input type="checkbox"/> _____						Supervisor's Authorization: It is important supervisor's review this information for accuracy. Scheduled/Pre-authorization contiguous overtime is <u>not</u> Callback.							
EMPLOYEE SIGNATURE		SUPERVISOR'S AUTHORIZATION			CITY ID# (PERNR)		DATE OF AUTHORIZATION						

By signing this form both employee and supervisor are certifying that the information presented is correct.

Source: Provided by SDPD.

Overtime is generally approved by an appropriate supervisor.

SDPD procedure requires overtime authorization forms to be approved by the officer's immediate supervisor or the acting supervisor who oversaw the overtime shift. However, according to SDPD, if the immediate supervisor or acting supervisor are unavailable, the form may be approved by a supervisor with knowledge of the overtime worked.

100 percent of the 126 sampled forms were authorized by an appropriate supervisor. We found that all sampled forms were authorized appropriately, indicating that overtime is being approved and generally monitored. We identified 36 forms that were authorized by supervisors that we could not initially verify were appropriate due to "Out of Class Assignments," which is when an officer serves in a different rank than their usual assignment, or other special circumstances. However, SDPD provided satisfactory support for the appropriateness of the special circumstances for these forms. Overall,

the flexibility in the policy for special circumstances indicates that SDPD does not have a straightforward way to verify the validity of the approving supervisor on an overtime authorization form, creating risk for overtime fraud or abuse. We did not find any evidence of fraud or abuse, given that SDPD provided evidence to support each overtime authorization and 100 percent of the forms were present, accurate, and signed in compliance with policy.

SDPD's overtime tracking and authorization is more accurate than some other cities' police departments.

Comparatively, police overtime audits in other cities have found larger shares of sampled overtime authorization forms to be missing, illegible, or to have problems with supervisor approval. A 2022 audit of overtime at the Dallas Police Department found that, out of a judgmental sample of 268 overtime forms, 1.5 percent were not signed by a supervisor, 4 percent had illegible signatures, and 48 percent were signed by an individual whose authority to approve overtime could not be confirmed. A 2022 audit of Honolulu Police Department overtime found that 2 percent of sampled overtime authorization forms were missing, 4 percent had a time discrepancy between the overtime form and the payroll system, and 28 percent of forms were missing the hours worked. Additionally, a 2016 San Jose police overtime audit found that supervisors did not receive enough training on overtime form submission, resulting in errors and a lengthy approval process.

Conclusion

Our analysis revealed that officers generally comply with overtime timekeeping procedures and SDPD tracks overtime accurately. As we did not identify any notable weaknesses in compliance with SDPD's overtime tracking policies and procedures, we do not have any recommendations related to this finding.

Appendix A

Definition of Audit Recommendation Priorities

The Office of the City Auditor maintains a priority classification scheme for audit recommendations based on the importance of each recommendation to the City, as described in the table below. While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration’s responsibility to establish a target date to implement each recommendation, taking into consideration its priority. The City Auditor requests that target dates be included in the Administration’s official response to the audit findings and recommendations.

PRIORITY CLASS*	DESCRIPTION
1	Fraud or serious violations are being committed. Significant fiscal and/or equivalent non-fiscal losses are occurring. Costly and/or detrimental operational inefficiencies are taking place. A significant internal control weakness has been identified.
2	The potential for incurring significant fiscal and/or equivalent nonfiscal losses exists. The potential for costly and/or detrimental operational inefficiencies exists. The potential for strengthening or improving internal controls exists.
3	Operation or administrative process will be improved.

* The City Auditor is responsible for assigning audit recommendation priority class numbers. A recommendation that clearly fits the description for more than one priority class shall be assigned the higher priority.

Appendix B

Audit Objectives, Scope, and Methodology

Objective

In accordance with the Office of the City Auditor's Fiscal Year 2023 Audit Work Plan, we conducted a performance audit of the San Diego Police Department (SDPD) Overtime. Our audit included the following objectives:

1. Determine if SDPD's overtime policies are in line with best practices.
2. Determine if SDPD's overtime policies are followed.
3. Determine if SDPD's overtime costs are in line with comparable police agencies.
4. Determine what factors contribute most to SDPD overtime costs and if there are opportunities to reduce overtime costs.

Scope

Our analysis focused on overtime hours worked by sworn officers eligible for overtime from fiscal year (FY) 2018 through FY2023. Sworn officers eligible for premium rate overtime at SDPD include Police Detectives, Officers, Sergeants, and Recruits. Police Captains and Lieutenants are sworn officers but are ineligible for premium rate overtime.

For sampling overtime shift compliance, we analyzed two payroll periods in April 2023 and May 2023. We started fieldwork on the audit in April 2023, so these months were the timeliest data at the time of analysis. Our audit scope did not include an analysis of SDPD's staffing model, hiring policies, officer retention, or vacancies.

Methodology

To determine if SDPD's overtime policies are in line with best practices, we:

- Reviewed police overtime best practices on work hours, organization, and officer fatigue from the Department of Justice's National Institute of Justice and its Office of Community Oriented Policing Services, the International Association of Chiefs of Police, and the Federal Bureau of Investigation Law Enforcement Bulletin.
- Reviewed applicable overtime laws, policies, and agreements, such as:
 - The Fair Labor Standards Act of 1938
 - California Labor Code

- California Department of Industrial Relations labor provisions on overtime
- The City's overtime policies in administrative regulations, the Personnel Manual, Council Policies, and the Annual Salary Ordinance
- SDPD overtime policies and procedures
- SDPD special event overtime reimbursement rates
- SDPD agreements with the Police Officers Association and the Municipal Employees Association
- Benchmarked SDPD overtime and compensatory time policies and special events overtime reimbursement rates with comparable cities, the top 10 largest cities in California, and police jurisdictions local to San Diego County, including:
 - Comparable cities:
 - Austin, TX
 - Dallas, TX
 - Phoenix, AZ
 - San Antonio, TX
 - Seattle, WA
 - Top ten largest cities in California:
 - Anaheim, CA
 - Bakersfield, CA
 - Fresno, CA
 - Long Beach, CA
 - Los Angeles, CA
 - Oakland, CA
 - Sacramento, CA
 - San Francisco, CA
 - San Jose, CA
 - Local police jurisdictions in San Diego County:
 - Carlsbad, CA
 - Chula Vista, CA
 - Coronado, CA
 - El Cajon, CA
 - Escondido, CA
 - La Mesa, CA
 - National City, CA

- Reviewed police overtime audits and reviews conducted by:
 - Baltimore, MD
 - Berkeley, CA
 - Dallas, TX
 - Denton, TX
 - Honolulu, HI
 - King County, WA
 - Portland, OR
 - Sacramento, CA
 - San Diego Association of Governments
 - San Francisco, CA
 - San Jose, CA
 - Seattle, WA
- Interviewed key staff and stakeholders:
 - Chief of Police
 - Executive Assistant Chief of Police
 - SDPD Administrative Services Deputy Director and Administrative Services Department staff
 - SDPD Operational Support Unit staff
 - SDPD Information Services Unit staff
 - Police Officers Association representative
 - Fleet Safety Unit at SDPD Traffic Division
 - Councilmembers and staff of two City of San Diego Councilmember Offices on the Public Safety Committee
- Compared SDPD policies to best practices and determined effects of discrepancies by analyzing:
 - The share of sworn officers eligible for premium overtime who worked more than 12, 16, and 19 hours in a day at least once in April 2023 (specifically April 1 through April 28) and May 2023 (specifically April 29 through May 26). May was chosen for timeliest data, but we also analyzed data from April because, according to SDPD, Memorial Day creates significant officer overtime, potentially distorting the data.
 - The share of overtime hours that would have been lost if SDPD had a total work limit of 60, 70, or 80 hours per week, or a total work limit of 16 or 19 hours per day in FY2023.

To determine if SDPD's overtime policies are followed, we:

- Tested payroll data to ensure that ineligible sworn employees (Police Captains and Police Lieutenants) were not receiving premium overtime compensation.
- Tested a representative sample of overtime authorization forms submitted by sworn officers in May 2023 to confirm proper overtime calculation and compliance with overtime authorization form submission policies. We took a stratified sample of 131 overtime forms; 67 sampled from 5,363 total forms of non-outliers and 64 sampled from 909 total forms for outliers. Outliers were defined as officers who worked 1,000 overtime hours or more in FY2023. The sample had a 90 percent confidence level with a 10 percent margin of error. The population included all forms submitted by officers for overtime worked during the two pay periods in May, from April 29 through May 26, 2023.
- Tested a judgmental sample of overtime authorization forms submitted by sworn officer overtime outliers in May 2023 to find the amount of rest time between shifts and length and time of shifts.
- Researched the distribution of overtime across SDPD sworn officers from FY2018 through FY2023 and civilian employees from FY2018 through FY2022.
- Tested for sworn overtime outliers by internal order (i.e., overtime shift type) and by position type from FY2018 through FY2022.
- Analyzed which internal orders sworn overtime outliers worked.
- Tested for trends in the units where sworn outliers worked.
- Determined the equity of access to overtime and overtime hours worked by:
 - Reviewing the distribution of demographics of officers and civilian employees who worked overtime to determine if the distribution is representative of overall SDPD officer and employee demographics; and
 - Researching the overtime sign-up process by division and internal order at SDPD to analyze access of overtime opportunities by employee demographics.
- Reviewed SDPD's Early Identification and Intervention System overtime alert processes and tested number of notifications sent in FY2023.

To determine if SDPD's overtime costs are in line with comparable police agencies, we:

- Reviewed SDPD's total budgets, overtime budgets, and actual spending from FY2013 through FY2023.
- Benchmarked SDPD overtime budgets from FY2021 and FY2022 with comparable cities, the top 10 largest cities in California, and police jurisdictions local to San Diego County, including:
 - Comparable cities:
 - Atlanta, GA
 - Austin, TX
 - Dallas, TX
 - Phoenix, AZ

- San Antonio, TX
- Seattle, WA
- Top 10 largest cities in California:
 - Anaheim, CA
 - Bakersfield, CA
 - Fresno, CA
 - Long Beach, CA
 - Los Angeles, CA
 - Oakland, CA
 - Sacramento, CA
 - San Francisco, CA
 - San Jose, CA
- Jurisdictions local to San Diego County:
 - Carlsbad, CA
 - Chula Vista, CA
 - Coronado, CA
 - El Cajon, CA
 - Escondido, CA
 - La Mesa, CA
 - National City, CA
 - Oceanside, CA
 - San Diego County Sheriff
- Tested for relationship between amount spent on overtime and crime rate, population size, number of police full-time employees, and officer-to-population ratio in San Diego and benchmark cities in FY2021.

To determine what factors contribute most to SDPD overtime costs and if there are opportunities to reduce overtime costs, we:

- Interviewed the Department of Finance.
- Interviewed a fiscal and policy analyst with the Office of the Independent Budget Analyst.
- Reviewed a Department of Finance analysis on the budget impacts of fully staffing SDPD.
- Reviewed the Independent Budget Analyst's reports from FY2013 through FY2024 on civilianization and reports from FY2019 through FY2024 on the contributors to overtime at SDPD.
- Analyzed which types of overtime at SDPD used the most hours from FY2018 through FY2023.

- Reviewed civilianization best practices from the International Association of Chiefs of Police.
- Tested if civilian staff growth has kept pace with sworn personnel.
- Compared salary ranges for Police Investigative Service Officer I, Police Recruit, and Police Officer I positions.
- Analyzed the share of calls for service that civilian employees could have responded to from October 2020 through March 2021 and from April 1, 2023 through June 30, 2023.
- Analyzed officer vacancy rates from FY2019 through FY2023.
- Analyzed officer response times by call priority type from FY2019 through FY2023.
- Analyzed SDPD total number of received and dispatched calls for service and Get It Done service requests from FY2018 through FY2023.

Data Reliability

We primarily worked with timecard, budget, payroll, and personnel data auditors extracted directly from SAP, as well as dispatch data provided by SDPD. We assessed the reliability of these data sets by reviewing existing information about the data and the systems that produced them and interviewing SDPD and Department of Finance staff knowledgeable about the data. In addition, we traced a statistically random stratified sample of overtime slips to the timecard data (see Finding 3). We determined that the data were sufficiently reliable for the purposes of responding to our objectives.

Internal Controls Statement

We limited our review of internal controls to specific controls relevant to our audit objectives, described above. We tested the following controls:

- Oversight and monitoring of police overtime;
- Oversight and monitoring of police overtime costs, budget, and activities;
- Limits on number of hours worked by officers and/or rest time;
- Timekeeping and payroll systems;
- Equity of access to overtime shifts; and
- Oversight of officer workload and civilianization policies.

Compliance Statement

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.



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: February 27, 2024

TO: Andy Hanau, City Auditor
via Eric Dargan, Chief Operating Officer

FROM: David Nisleit, Chief of Police

SUBJECT: Management Response to Performance Audit of SDPD Overtime Use

This memorandum aims to provide the Police Department's response to recommendations made by the Office of the City Auditor (OCA) in their Performance Audit of overtime usage by the San Diego Police Department (SDPD).

Summary:

The San Diego Police Department agrees with the objectives outlined by the Office of City Auditor related to an audit of overtime usage by Department members. The audit acknowledges that SDPD's staffing model adhered to best practices and was developed to maintain service levels, meet community expectations, and, most importantly, ensure timely responses to emergencies and focus on preserving life.

SDPD agrees that a significant portion of its budget is comprised of overtime funds utilized as described in Finding Two, Exhibit A which is directly related to unfilled sworn officer and civilian positions.

The Office of the City Auditor made 4 recommendations within this performance audit. The proposals outline the following issues: mandating 8-hour breaks between shifts absent specific situations, prioritizing overtime allocation in areas with the greatest need, develop internal notifications within SAP and/or the payroll review process to identify the number of officers that fail to take 8-hour breaks between shifts or those who exceed the number of hours worked in designated time periods, and conduct further analysis on the benefits of additional civilian staff, Police Investigative Service Officers (PISOs), to maximize Department resources and improve response times.

The Department acknowledges that the OCA recommendations have merits and must be thoroughly analyzed to determine how they integrate into SDPD's current operational needs and working environment. Additionally, some recommendations will alter the working conditions of Department members represented by the San Diego Police Officers Association (SDPOA) and Municipal Employees Association (MEA), SDPD must engage in the meet and confer process over their potential inclusion in its procedures.

Recommendation 1.1:

The San Diego Police Department (SDPD) should amend its applicable policies and procedures to require officers to take an 8-hour break between shifts. SDPD should clearly define what constitutes a “shift” and should clarify the specific situations that would merit an officer not taking an 8-hour break between shifts, such as officers approved to extend their current shift, a necessary court appearance, a call-back that has been approved by policy, or an emergency. (Priority 1)

Management Response: Agree

SDPD agrees that the arguments made and evidence presented by the OCA related to this item merit additional analysis by the Department for implementation and has directed its Research, Analysis, and Planning (RAP) unit to assess Exhibit E from the OCA’s audit identifying law enforcement agencies that have daily and weekly work limitations for its personnel.

RAP will be tasked with developing draft procedures for this item for review by the Chief’s Executive Committee, and once approved, it will be forwarded to Human Resources to comply with meet and confer requirements.

Target Implementation Date: December 2025

Recommendation 1.2:

We recognize the San Diego Police Department (SDPD) is working with limited staffing resources and overtime is necessary, but SDPD could prioritize its needs to ensure staffing levels are highest where the needs are greatest. To do so, we recommend:

- a. SDPD should prioritize its overtime allocation, potentially through a central overtime function. If additional resources are necessary to implement this recommendation, SDPD should present those needs to the City Council and its relevant committees.
- b. Once overtime allocation is prioritized, SDPD should review its applicable policies and procedures to determine if it should set a limit on the maximum number of hours officers can work in a day and a rolling week to ensure officer and public safety. To determine if a limit is necessary and the appropriate limit, SDPD should consider the available research on the increased risks of long shifts and repeated long shifts. However, due to the nature of public safety work, SDPD should also clarify in its policies and procedures the specific circumstances in which an officer would be allowed to work more hours than the policies allow. SDPD should present the results of its review and determination on whether or not to set a limit, and what the limit should be, to the appropriate City Council committee.
(Priority 2)

Management Response: Agree

SDPD's overtime usage mandates providing premium compensation when personnel work on City-observed holidays and when required to testify in court as agreed upon in the MOUs with its represented employee associations. There are also contractual obligations specified in Special Event contracts requiring overtime that may be partially or fully reimbursable to the City.

While these overtime categories may not be subject to prioritization due to accepted terms and conditions found in contracts and agreements, SDPD is committed to prioritizing remaining overtime categories and allocations as outlined in the audit. Additional software, staff, and resources will be necessary to effectively centralize the Department's overtime projects, which are contingent upon Council approval of any new positions and/or funding. The Department has directed its Research, Analysis, and Planning (RAP) unit to assess recommendations from the OCA's audit and develop draft procedures for this item for review by the Chief's Executive Committee, and once approved, it will be forwarded to Human Resources to comply with meet and confer requirements.

Target Implementation Date: December 2025

Recommendation 1.3:

SDPD should operationalize Recommendations 1.1 and 1.2 by setting notifications in SAP and/or the payroll review process to ensure the total number of hours worked in a day and a rolling week does not exceed the maximums set by SDPD policies and procedures. The oversight in SAP and/or the payroll review process should also determine when officers have failed to take the required 8-hour consecutive time off between shifts. SDPD should amend its applicable policies and procedures to include who will monitor this notification and raise the issue to the relevant supervisors, including processes for addressing violations and a policy for exceptions. (Priority 2)

Management Response: Agree

SDPD is often abundant in data but needs help to develop programs or acquire software that can assist Department decision-making for various reasons related to budget, unfilled positions, and TRUST Ordinance provisions.

As was noted in a previous performance audit from the OCA, SDPD recognizes the need to evaluate, interpret, and make informed decisions that rely on data. The Department has already begun evaluating SAP and software programs from vendors that can assist Commanding Officers in making data-driven decisions from the information contained within SAP and other disparate databases related to staffing. Monitoring overtime information and implementing notifications, along with developing applicable policies and procedures by RAP, will enable the Department to implement this recommendation under the meet and confer requirements triggered by changes in working conditions to its employees.

Target Implementation Date: December 2025

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Andy Hanau, City Auditor
February 27, 2024

Recommendation 2.1

The San Diego Police Department should conduct an analysis on how many Police Investigative Service Officers or similar civilian positions would be necessary to maximize civilian and sworn resources and present this analysis to the appropriate City Council committee. (Priority 2)

Management Response: Agree

The Research, Analysis, and Planning (RAP) and Crime Analysis Unit (CAU) have already researched this issue and advised how PISOs could assist investigative staffing throughout the Department. They presented their findings in January 2023 to the CEC, identified commands that did not have PISOs or Reserve Officers, and surveyed commanding officers regarding their need for personnel in this classification to offset workloads and overtime. The Department requested 20 additional PISOs in 2022, which was denied. The Department will again analyze this recommendation for consideration by the City Council.

Target Implementation Date: December 2024



David Nisleit
Chief of Police

DN/sw



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