

## Audit Report

# Austin Police Department's Early Intervention System for Officers

July 2021



The purpose of the Austin Police Department's (APD) early intervention system, the Guidance Advisory Program (GAP), is to identify officers who may need additional support to do their job safely and effectively. The U.S. Department of Justice recommends police departments use early intervention systems (EIS) and most police departments with more than 250 officers have an EIS.

APD's GAP system does not effectively identify officers who may need assistance due to significant data reporting issues. When officers are identified for assistance, the GAP does not connect these officers to existing APD support or wellness services. Also, APD does not track or analyze program trends to evaluate officer or program performance to ensure the GAP is fulfilling its mission. In addition, APD management has not generated true program buy-in and the GAP is not working as intended.

Finally, the GAP may not be tracking the right information to effectively identify officers truly needing assistance and program parameters have not been reviewed or updated in years. APD recently began reviewing the GAP's parameters to revise and improve the program.

---

# Contents

Objective and Background .....	2
What We Found .....	4
Recommendations and Management Response .....	14
Scope and Methodology .....	17

Cover: Detective Scott Stanfield, Austin Police Department

---

## Objective

Does Austin Police Department’s early intervention system for officers track the appropriate indicators, proactively surface areas of concern, and effectively connect officers with wellness resources?

---

## Background

In June 2020, the Austin City Council issued Resolution 20200611-096<sup>1</sup> affirming its commitment to reimagining public safety and directing the City Manager to oversee work to improve the Austin Police Department (APD). In coordination with that effort, this audit looks at APD’s early intervention system for officers.

Police departments use early intervention systems (EIS) to identify officers who may need additional support to do their jobs safely and effectively. According to the Department of Justice, three key benefits to using a well-implemented EIS include:

- Improving supervisors’ ability to monitor employee performance.
- Aiding employees in correcting their own behavior when it departs from department expectations.
- Strengthening public confidence in law enforcement.<sup>2</sup>

These systems are non-disciplinary and work by tracking a variety of performance indicators. When an officer crosses preset thresholds for a particular indicator or a combination of indicators, the officer “activates” in the system. Police management is then alerted that the officer may need additional support or intervention.

Implemented in 2006, APD’s early intervention system is called the Guidance Advisory Program (GAP). APD’s GAP currently tracks three indicators: Response-to-Resistance (more commonly referred to as “use-of-force”), Internal Affairs complaints, and use of sick leave. On the next page, Exhibit 1 illustrates these three indicators and their thresholds for activation in the system.

---

Common EIS performance indicators include use-of-force, complaints, firearm discharges, policy violations, preventable vehicle collisions, and sick leave.

---

<sup>1</sup> <https://www.austintexas.gov/edims/document.cfm?id=342179>

<sup>2</sup> U.S. Department of Justice, 2019. Law Enforcement Best Practices: Lessons Learned from the Field. Washington, DC: Office of Community Oriented Policing, Page 61.

**Exhibit 1: APD tracks three indicators with preset thresholds to identify officers who may need assistance**

Performance Indicator	 Response to Resistance Incidents	 Internal Affairs Complaints	 Use of Sick Leave
Performance Threshold*	Patrol (6 incidents) Downtown (9 incidents) Non-Patrol (varies)	Level 1 (2 complaints) Level 2 (4 complaints)	160 Hours

\*Not to exceed in a 12-month period

Source: Auditor analysis of Austin Police Department 2020 General Orders related to the Guidance Advisory Program, April 2021

According to the Department of Justice, there are seven recommended practices for establishing an EIS. These practices address program design, implementation, ongoing evaluation, and administration. While Austin incorporates some of these principles, the current program is not aligned with these practices and does not appear to be effectively meeting the City or officers' needs.

**Exhibit 2: APD's Guidance Advisory Program is not aligned with best practices**

Department of Justice Best Practices for Early Intervention Systems	APD is not aligned with Best Practices for Early Intervention Systems
 <b>Processes</b> Establish processes to ensure proper administration of the program	APD has established processes for the GAP, but the program is not effective or working as intended
 <b>Data Collection</b> Program data should be broad and include positive and negative indicators	Data tools do not pull all the needed information and more than a third of activations were missed for fiscal year 2020
 <b>Support Services</b> The program should provide the right support services to address identified issues	The GAP does not connect officers to support services even though APD has many of the recommended services
 <b>Monitoring &amp; Improvement</b> The program should be continuously monitored and evaluated for improvement	There is minimal reporting on GAP activations and no trend analysis, tracking, or evaluation
 <b>Buy-In</b> Generate program "buy-in" at all levels of the department	APD staff have not fully bought-in to the GAP
 <b>Training</b> All members of the department should understand how to use the program	GAP training is minimal and not provided regularly
 <b>Transparency</b> Ensure all stakeholders understand how the program works	The purpose of the GAP and how it works is not clear to all users

Source: Auditor analysis of Austin Police Department 2020 General Orders related to the Guidance Advisory Program, April 2021

---

# What We Found

## Summary

The purpose of APD's GAP early intervention system (EIS) is to identify officers who may need additional support to do their job safely and effectively. The U.S. Department of Justice recommends police departments use EIS and most police departments with more than 250 officers have an EIS. APD's GAP system does not effectively identify officers who may need assistance due to significant data reporting issues. When officers are identified for assistance, the GAP does not connect these officers to existing APD support or wellness services. Also, APD does not track or analyze program trends to evaluate officer or program performance to ensure the GAP is fulfilling its mission. In addition, APD management has not generated true program buy-in and the GAP is not working as intended.

Finally, the GAP may not be tracking the right information to effectively identify officers truly needing assistance and program parameters have not been reviewed or updated in years. APD recently began reviewing the GAP's parameters to revise and improve the program.

---

## Finding 1

The Austin Police Department's early intervention system does not fulfill its mission to effectively identify officers who may need assistance and connect officers to support services. In addition, the department does not track or monitor the program's success.



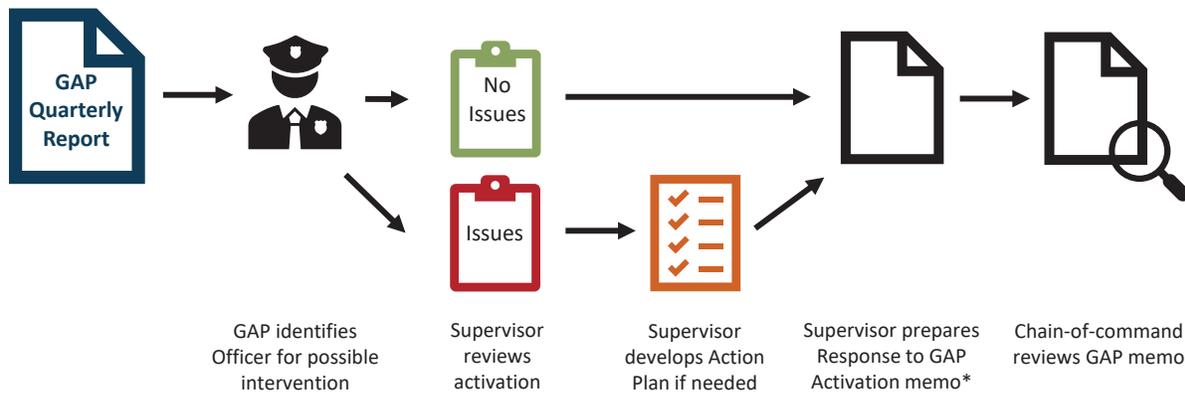
APD has established processes for the Guidance Advisory Program, but the program is not effective or working as intended

The processes for administering the GAP are established in APD's General Orders. The General Orders state that the GAP should be audited every quarter. The "audit" or analysis staff perform each quarter to determine which officers have activated is conducted by the GAP Coordinator.

The GAP Coordinator informs supervisors if an officer in their command activates and the supervisor reviews the incidents, complaints, or sick leave usage in question. This review is documented in a Response to GAP Activation Memo which is reviewed by the officer's Chain-of-Command. If the supervisor identifies issues to address, an Action Plan can be developed. On the next page, Exhibit 3 provides a basic overview of this process.

Our review found several areas of concern. First, there are significant data integrity and procedural issues with the GAP quarterly report that results in missing and inappropriate activations. Second, due to the limitations of the current system in place, supervisor reviews rarely identify behavioral or wellness issues to address and officers are not connected to resources via the GAP. Finally, the program is not actively monitored or evaluated to ensure its success or effectiveness.

### Exhibit 3: Overview of APD's Guidance Advisory Program activation process



\*A response to GAP Activation memo documenting the supervisor's review is prepared for every activation regardless of whether issues are identified.  
 Source: Auditor analysis of Guidance Advisory Program process, June 2021



**Data tools do not pull all the needed information and more than a third of activations were missed for fiscal year 2020**

We reviewed GAP activation data for fiscal year 2020 and identified significant errors in the reported data resulting in many missed and inappropriate activations. Each quarter, the GAP Coordinator runs a query to pull information from various APD databases to determine which officers have activated in the system. The GAP Coordinator compiles the results in a GAP Summary Report. This query does not consistently pull accurate or complete information from these databases as noted in our analysis of the three indicators:

The GAP tracks three indicators: Response-to-Resistance (or use-of-force) incidents, Internal Affairs complaints, and use of sick leave.

The 5-year average number of GAP activations is 429 per year with most activations caused by Response-to-Resistance incidents.

- Response-to-Resistance data – The query did not identify about a third of the officers it should have, based on the preset thresholds. As a result, those officers did not activate. In addition, we identified several officers who should have activated in more than one quarter in fiscal year 2020 but these officers only activated once.
- Internal Affairs data – We identified two officers that should have activated but did not. In another instance, an officer who activated was mistakenly removed from the GAP Summary Report.
- Sick Leave data – The query pulled the wrong number of sick leave hours for at least 6% of sick leave activations. The GAP coordinator manually checked sick leave activations for three of the four quarters to identify these errors. The remaining quarter was not manually checked due to additional pandemic assignments. While staff manually checks sick leave activations to ensure they are accurate, staff does not check the payroll data to see if there are officers who should have activated but were not identified by the query.

APD staff said they were aware that the query, a MicroStrategy script, had not been consistently pulling accurate information for some time. Staff said the script was developed years ago by a third-party contractor and is no longer aligned with the GAP's activation rules. Current staff do not know how to fix the script so that it pulls the correct information. As a result, the GAP coordinator has been manually reviewing and adjusting many of the activations each quarter. The GAP Coordinator reported this analysis is time consuming and is not reviewed or checked by anyone else. Relying on one individual to conduct and manually check the analysis is not an effective process and does not provide assurance that all errors are identified.

APD staff said the department is transitioning to a new software system to track Internal Affairs complaints and Response-to-Resistance incidents over the course of this year. In addition, staff said the City will soon replace its payroll system with a new software system. Staff are in the process of determining how to operate and pull information from these new systems to meet the GAP's reporting requirements.



**The Guidance Advisory Program does not connect officers to support services even though APD has many of the recommended services**

As mentioned above, when an officer activates, their supervisor reviews the factors contributing to the activation and determines whether there are any issues to address. In theory, an officer whose behavior is not aligned with departmental expectations may need assistance such as additional training, counseling, or therapy. While APD has many of the recommended programs and services to meet officers' needs, it does not appear the GAP connects officers to these services.

Supervisor reviews of activations are documented in GAP Activation Response Memos. The supervisor notes one of three outcomes: no issue identified, the issue was informally addressed, or an action plan was developed to address the issue. This memo is reviewed by the officer's Chain-of-Command.

---

An officer's Chain-of-Command includes a supervising Sergeant, Lieutenant, and Commander.

---

We reviewed a random sample of 60 Activation Response Memos and found that 93% of the time, supervisors and the Chain-of-Command did not identify any issues to address. While informal counseling or conversations were noted in 7% of the memos, none of the memos recommended a formal action plan or referral to services.

In addition, we noted APD's GAP policy does not specify what happens if an employee is put on an action plan. The policy specifies the action plan should have a completion date. However, it does not say who is responsible for follow-up or if there are any consequences for not completing the action plan. Some peer city EIS policies we reviewed specified clear action plan follow-up steps, including the individuals responsible for completing those steps, and consequences for officers who do not complete the action plan.

For example, in Houston, if a “Plan of Action” is prepared for an officer, it is submitted to the Early Warning System (EWS) Committee chair for review and approval. The officer’s chain-of-command and the committee chair meet with the officer to share the “Plan of Action.” The officer also meets with their immediate supervisor and commander once a week to discuss progress, as well as with an EWS Unit caseworker once a month. Failure to progress on the plan may result in the committee chair recommending indefinite suspension of the officer.

APD staff said the GAP is not viewed as helpful, it is not used to connect officers to services, and most of the time, the memos do not indicate any issues to address. In addition, APD staff said supervisors often feel they are already aware of issues identified by GAP. This is because Response-to-Resistance incidents and Internal Affairs complaints are reviewed at the time they happen through separate processes. However, these reviews are disciplinary in nature and not related to providing support or wellness services. According to the Department of Justice, early intervention systems should offer a “range of intervention alternatives” to address the various causes of officer performance issues. These interventions should be separate from the disciplinary process. Both disciplinary and early intervention systems have their place but are not a substitute for one another.

According to staff, APD’s Wellness Division was established approximately four years ago and has various services to assist officers. Staff stressed the importance of making participation in wellness interventions voluntary and confidential and this practice is consistent with information we found for other peer cities. However, without tracking access to and use of these services in relation to the GAP, APD has no way to determine if these interventions are working.

---

APD’s wellness resources include Peer Support, Employee Assistance, and Chaplain programs; treatment centers for inpatient and outpatient therapy; the wellness application; and physical fitness resources.

---

APD launched a wellness app in May 2021. A manager for the program said the app will allow staff to access APD’s wellness resources. Staff said the app should help APD track how often services are accessed and what types of services are used most. At this time, it does not appear the app will help APD track services specifically used by officers referred by the GAP.



**There is minimal reporting on Guidance Advisory Program activations and no trend analysis, tracking, or evaluation**

According to the Department of Justice, EIS can be used to “detect emerging patterns or trends in an agency which might call for policy revisions, training, change to existing practices, or investigations into other factors not tracked by the system.”<sup>3</sup> APD staff said there are no performance metrics reported in relation to the GAP and they have no way to measure the program’s success. In addition, the department is not analyzing results to identify trends or determine if certain officers, assignments, or supervisors need additional support services.

<sup>3</sup> U.S. Department of Justice, 2019. Law Enforcement Best Practices: Lessons Learned from the Field. Washington, DC: Office of Community Oriented Policing, Page 69.

---

During the 5-year period we reviewed, 56% of officers who activated had only 1 activation.

---

For example, the GAP does not track how many activations result in no action taken, an informal conversation, or an action plan. This makes it difficult to determine if there are officers who are activating more often than others. While one activation may not warrant intervention, detecting a pattern of behavior over time by tracking activations may result in a different conclusion. We analyzed a 5-year period of GAP summary reports and activation memos. Our analysis found that 7 percent of officers account for 17 percent of activations with an average of 5 activations per officer. Also, 11 officers had 6 or more activations during this time.

We looked at the supervisors' memos reviewing activations from fiscal year 2020 for 5 of these officers. None of the memos identified any issues, mentioned previous activations, and often stated there was "no pattern of behavior." One officer activated three quarters in a row with a total of 45 Response-to-Resistance incidents. The supervisor noted no issues and "no patterns or trends" that might cause concern. While these Response-to-Resistance incidents may have followed procedure, the number of incidents appears to be outside the norm. This might not be evident to the supervisor since the behavior under review was not compared to other officers working that assignment. Identifying problem areas and providing training in de-escalation tactics may help reduce such Response-to-Resistance incidents and the potential for a negative outcome for the people involved.

As mentioned above, we did not see evidence of any action plans put in place or follow-ups on such plans. Without this information, APD does not know if recommended services were accessed or if interventions were effective. In addition, staff said they have not conducted any GAP program surveys to determine how officers and supervisors perceive the program or what improvements might be needed.

---

## Finding 2

APD has not generated buy-in, provided the necessary training, or created the transparency needed to support use of the GAP.

According to the Department of Justice's best practices, the success of EIS depends on generating buy-in at all levels of the organization, training all members of the department in how to use the program, and ensuring the system is transparent to all stakeholders so they can see and understand how the program works. APD's system is not functioning as it should in these areas, and it appears there is a general lack of support for the GAP.



### APD staff have not fully bought-in to the GAP

Based on interviews with APD staff from various levels of the organization, it does not appear that the GAP is supported or used as intended. APD staff said that supervisors perceive the GAP to be a duplication of efforts. They do not find the current system useful. Also, staff said officers view the program as punitive and we noted the GAP does not have an appeal process if an officer feels they have been unfairly or inappropriately activated in the system. In addition, APD staff were unclear about the history of GAP, including how and why the current system indicators were selected. This suggests the program has not been a priority for the department.

GAP staff said they are aware the GAP is not working well. They have begun efforts to gather information about the program and explore alternatives. In March 2021, staff convened focus groups to discuss changes and additions to the indicators being tracked, the thresholds for those indicators, and how the data will be collected. APD executive management said the GAP is a priority for the department and they want to better support officers with an effective EIS.



### GAP training is minimal and not provided regularly

Based on our review of GAP training materials, supervisors are given a broad overview of the program and how it works. However, there is little to no information on how supervisors should intervene if they identify an issue via GAP or what support services might best address different types of behaviors or issues. The GAP General Orders state that an officer can be placed on an "Employee Success Plan." However, there is no information on what this plan should include, how often a supervisor should follow-up, or how to determine successful completion of the plan.

In addition, APD staff said that supervisors are trained how to administer the GAP during Supervisor School. However, some individuals become supervisors and do not receive this training right away. New supervisors receive "peer to peer" training on GAP until they are able to attend Supervisor School. APD staff said supervisors have often already reviewed a GAP activation before they receive any training on how to properly conduct a review.

Finally, APD staff said officers typically have a lot of questions about how GAP works and if it will have negative impacts on them. This suggests officers do not receive adequate training about the intent and purpose of the GAP, which is to support officers by proactively addressing issues before they lead to more significant impacts.



### The purpose of the GAP and how it works is not clear to all users

---

The Office of Police Oversight seeks to provide impartial oversight of APD's conduct, practices, and policies to enhance accountability.

---

The Department of Justice notes that “employees will likely resent and resist the EIS if it lacks transparency.” As noted above, officers generally do not have a good understanding of how the GAP system works. Also, not all supervisors may fully understand GAP when conducting a review. We also noted staff from the Office of Police Oversight did not appear to have a good understanding of all the GAP indicators or how the program works.

The purpose of an EIS such as the GAP is to proactively identify officers who may be having issues that need to be addressed. The system should provide support services to help prevent adverse outcomes for the officer, department, or public in the future.

APD staff told us they knew about problems with the tool used to pull data that generates GAP activations. We saw good faith efforts from the GAP Coordinator to manually correct these data problems. However, reporting errors still exist and the department continues to operate the program without a workable solution to correct these errors. In doing so, APD is not creating an environment of trust and transparency around its GAP system. It will take addressing these issues and following up with consistent and supportive actions to create a culture of transparency and true “buy-in” to the GAP or any other EIS. Without these best practice elements in place and working as intended, it is unclear what benefit such a system provides.

## Additional Observation

The GAP may not track the right amount or type of indicators. Also, the thresholds for those indicators may not be set at appropriate levels.

Department of Justice and other studies of early intervention systems (EIS) suggest that systems with more indicators and types of indicators are better able to identify, analyze, and evaluate officer performance and needs. Including positive indicators in an EIS is also recommended.

### APD may not track enough performance indicators

As discussed and shown in Exhibit 1, APD's GAP currently tracks three indicators. Our research found that other cities in Texas and the United States appear to track significantly more indicators. For example, Pittsburgh was highlighted by the Department of Justice and APD staff as having a strong EIS. The Pittsburgh EIS tracks 18 indicators including citizen complaints; civil claims; criminal investigations; disciplinary reports, grievances, and arrests; lawsuits; mandatory counseling; missed court dates; officer-involved accidents; sick leave; subject resistance reports; traffic stop reports; warrantless search and seizure; and weapon discharges, among others. Comparing indicators across cities is difficult as cities define and combine indicators in different ways. For example, Houston lists "vehicle crashes" as its own indicator, but vehicle crashes could result in an Internal Affairs complaint in Austin. Exhibit 4 compares the indicators tracked by some larger Texas cities based on how these cities identify indicators in their EIS policies.

**Exhibit 4: Peer city early intervention systems track more indicators than Austin**

City & Program	Austin Guidance Advisory Program	Dallas Employee Success Program	Houston Early Warning System	San Antonio Officer Concern Program
# of Indicators	3	6	10	5
Indicators	Response-to-Resistance Internal Affairs complaints Use of sick leave	Use-of-force complaints Internal Affairs-investigated complaints Summary discipline Criminal activity complaints AWOL from work or court Supervisory Review	Excessive use-of-force Misconduct including racial profiling Citizen injuries or deaths Citizen complaints Vehicle crashes City property damage Disregard for policies or procedures Low performance Extra employment violations Other factors identified by supervisor	Internal Affairs complaints Chain-of-command complaints Criminal activity complaints Chargeable city vehicle crashes Driving-related complaints

Source: Auditor analysis of early intervention programs based on available information, June 2021.

In addition to tracking fewer indicators, APD staff said they did not think the GAP program was tracking the right indicators. For example, staff said that a better indicator of how an officer is doing is an officer's productivity. Dallas, Houston, and Pittsburgh all track indicators related to work performance.

#### **APD's performance indicator thresholds may result in too many activations**

Once a police department determines what indicators it will track, it needs to determine where to set the thresholds for a system activation. If the threshold is set too high, the department may miss identifying officers in need of assistance. If the threshold is set too low, the department may identify so many officers the program is unable to effectively intervene. We noted that APD tracks all Response-to-Resistance incidents while Dallas, Houston, and San Antonio only track complaints about those incidents.

We compared the percent of activations in Austin to those in other cities to see if Austin's thresholds may be resulting in too many officers activating in the system. Due to the many variations in how programs are designed and administered, we were unable to get direct comparisons. However, in fiscal year 2020, at least 26% of Austin police officers activated in the GAP and staff estimated that only 1% of those officers received an action plan. In comparison, Pittsburgh said 20% of officers activated in their system and 5% received an action plan. Houston said 15% of officers activated in their system, but it was unclear how many received an action plan based on the available information. In contrast, San Antonio said less than 2% of officers activated in their system, but they estimated that 25% of those officers received an action plan. It appears that San Antonio's system thresholds result in fewer officers being flagged initially. In turn, these more targeted reviews identify a greater percentage of those officers that receive assistance.

We noted that shortly after APD's GAP began, it reported having six indicators in 2007. At that time, the program tracked IA complaints, sick leave, pursuits, negligent collisions, officer-as-victim reports, and a ratio of use-of-force versus arrests. The program began tracking its current three indicators in 2010. We did not find any documentation explaining this change and APD staff said they were not sure why these changes were made. In 2017, the department changed the threshold for Response-to-Resistance incidents for officers working downtown from six incidents to nine. Based on APD's documentation of this change, increasing the threshold for officers working downtown brought activations for these officers in line with officers working in other parts of the City.

APD recently began evaluating the GAP and looking at the number and types of indicators being tracked. The APD focus group discussed adding more indicators, changing the thresholds used for some indicators, and how best to collect the needed information using their new data systems. This work is ongoing.

---

A machine learning system is a computer system capable of modeling human behavior that trains itself to find patterns and make predictions.

---

### Predicting outcomes

Research on the effectiveness of EIS programs has been limited and it is unclear if such programs are able to predict which officers might need assistance to avoid a negative outcome. However, more recent, data-driven EIS programs developed in partnership with the University of Chicago claim to be predictive. These programs use machine learning and track more than 20 indicators. For example, the Charlotte-Mecklenburg Police Department implemented a machine learning system in 2017. The system was tested using historical data to ensure the right indicators were tracked. Developers claim their system correctly identified 10 to 20% more officers who went on to have an adverse incident while reducing incorrect identifications by 50% as compared to more traditional threshold systems. These developments are promising, but such systems take time and additional resources to implement.

DRAFT

---

## Recommendations and Management Response

1

In order to address the first finding, the Chief of Police should work with staff to identify and implement immediate fixes for the existing data collection issues so the Guidance Advisory Program identifies officers according to program rules, reports accurate activations, and connects officers to needed resources.

**Management Response:** Agree

**Proposed Implementation Plan:** The Department will continue to pursue an Early Intervention System (EIS) that will address the issues identified in the audit, while continuing to meet the needs of the Department, the City, and its residents. While this process is occurring, the Department will reevaluate the current GAP metrics and thresholds and reasonably amend them to identify officers according to program rules, produce more accurate activations, and connect officers to needed resources. This reevaluation will be conducted by the Guidance Advisory Program (GAP) coordinator and Austin Police Department (APD) Risk Management Unit.

**Proposed Implementation Date:** October 2021

2

In order to address the second finding, the Chief of Police should take steps, in alignment with the Department of Justice's early intervention system best practices, to create a culture necessary to support "buy-in" from all stakeholders of the Guidance Advisory Program or its successor. At a minimum, this should include providing consistent support including timely training and communications so the process is transparent, understood, and applied consistently.

**Management Response:** Agree

**Proposed Implementation Plan:** During the audit process, the APD Risk Management Unit, to include the GAP coordinator, were involved in numerous focus group meetings that included personnel throughout the Department. Sworn personnel, from the rank of Officer to Lieutenant, and Civilian personnel were involved in the discussions. The purpose of the discussions was to gather input into what metrics Department personnel believe should be included in the Department's GAP system and what thresholds should be established. Additionally, the Department believed that gathering input from a broad range of personnel would increase buy-in into any changes made to the existing GAP system, or for any system that was implemented to take its place.

The GAP coordinator and APD Risk Management Unit will evaluate the focus group discussions to identify EIS metrics and thresholds that will garner "buy-in" from all stakeholders. The APD Risk Management Unit will review the Department's GAP General Order to ensure it follows the current GAP system's capabilities. This revised policy will be streamlined and pushed out to Department personnel, along with a short informational video about the purpose of the GAP system and available Department resources that complement the system. This above action plan will include personnel from the Department's Training Academy and Wellness Division.

**Proposed Implementation Date:** December 2021

---

## Recommendations and Management Response

3

In order to ensure the Austin Police Department's Guidance Advisory Program (GAP) appropriately identifies officers needing assistance and connects them to resources, the Chief of Police should work with stakeholders to review and update the GAP's performance indicators and thresholds and ensure that wellness programs and services are identified to meet officers' needs. This effort should align with the Department of Justice's early intervention system best practices. Stakeholders should include:

- Staff from all levels of the Austin Police Department.
- Public safety oversight entities and community groups.
- Officer wellness professionals.

**Management Response:** Agree

**Proposed Implementation Plan:** This process has already begun with the Department taking a proactive approach to improving the current GAP system. As mentioned above, the Department conducted focus group discussions earlier this year with departmental personnel aimed at gathering internal information on what metrics our GAP should track and the thresholds for those metrics. In continuing that process, and in keeping with this current recommendation, the Department will partner with the following entities/personnel to ensure all stakeholders have an opportunity to provide input into GAP performance indicators, thresholds, and available wellness programs:

- Office of Police Oversight
- Community groups coordinated by the APD Community Engagement Liaison
- APD Wellness Division

Beginning immediately, the GAP Activation Response Memorandum (GAP Memo) will be amended to include resources available for supervisors to assign, or offer, to officers identified by the GAP (e.g. training courses, Employee Success Plan, etc.). Instances where officers are assigned or offered resources will be tracked to gauge the successes or challenges of the current program.

The goal for any EIS is to increase the overall wellness of employees through a holistic approach. While moving forward with this recommendation, the Department must ensure that stakeholders involved in the process are educated on the goals of an EIS, and that any remedies or resources should not be punitive in nature. For an EIS to be successful and to garner department "buy-in", punitive remedies should exist independently and outside the Department's EIS.

**Proposed Implementation Date:** GAP Memo amendment - Immediately

Stakeholder input and implementation - June 2022

---

## Recommendations and Management Response

4

Once the early intervention program elements noted in recommendation 3 are identified, the Chief of Police should ensure the Austin Police Department's early intervention system is implemented with the appropriate resources. The program should be effectively administered, monitored, and evaluated in alignment with the Department of Justice's early intervention system best practices. Effective administration includes ensuring the system accurately tracks, measures, and reports on indicators, thresholds, activations, interventions, and their success in addressing areas of concern. In addition, the Chief of Police should ensure the system is reviewed regularly to identify areas for improvement and ensure it is working as intended.

**Management Response:** Agree

**Proposed Implementation Plan:** The Department is currently in the process of identifying a third party EIS that can be brought in and connected to all of the existing, and potentially future, department databases. Any program that is brought in will be monitored by a coordinator and maintained by APD's Risk Management Unit. The EIS coordinator will be responsible for ensuring the system is tracking and addressing the appropriate areas of concern identified by the stakeholders in the above recommendation. Once an EIS system is chosen, APD's Risk Management Unit, Training Academy, and Wellness Division personnel will coordinate to develop appropriate action plans that can be utilized in conjunction with the EIS to ensure officers are connected with available and appropriate resources. Action plans will be maintained by the APD Risk Management Unit and reviewed annually. Lastly, a new EIS General Order will be drafted and published in conjunction with the newly implemented EIS and developed action plans.

**Proposed Implementation Date:** Identification and implementation of the new system - Fiscal Year 2023

---

## Scope

The audit scope included Guidance Advisory Program management, reporting, and use in fiscal years 2016 through 2020.

---

## Methodology

To complete this audit, we performed the following steps:

- Interviewed key management and staff from relevant divisions in the Austin Police Department.
- Interviewed staff from the Office of Police Oversight.
- Interviewed key management and staff from the Austin Law Department.
- Analyzed data pulled by staff from the Austin Police Department's Response-to Resistance, Internal Affairs, and Banner databases.
- Analyzed Guidance Advisory Summary Reports from fiscal years 2016 to 2020.
- Evaluated internal controls related to Guidance Advisory Program processes and reporting.
- Selected a random sample of Guidance Advisory Program Activation Response Memos for review and analysis.
- Researched best practices related to early intervention systems and officer wellness programs.
- Researched early intervention system best practices at law enforcement agencies in Los Angeles County and the cities of Dallas, Houston, San Antonio, and Pittsburgh.
- Evaluated the risk of fraud, waste, and abuse with regard to the administration of the Guidance Advisory Program.

---

## Audit 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.

The Office of the City Auditor was created by the Austin City Charter as an independent office reporting to City Council to help establish accountability and improve City services. We conduct performance audits to review aspects of a City service or program and provide recommendations for improvement.

#### **Audit Team**

Patrick Johnson, Audit Manager  
Kate Murdock, Auditor-in-Charge  
Mike Sim  
Kelsey Thompson

#### **City Auditor**

Corrie Stokes

#### **Deputy City Auditor**

Jason Hadavi

#### **Office of the City Auditor**

**phone:** (512) 974-2805

**email:** [AustinAuditor@austintexas.gov](mailto:AustinAuditor@austintexas.gov)

**website:** <http://www.austintexas.gov/auditor>



AustinAuditor



@AustinAuditor

Copies of our audit reports are available at  
<http://www.austintexas.gov/page/audit-reports>

*Alternate formats available upon request*