



SONOMA COUNTY SHERIFF'S OFFICE

EDDIE ENGRAM
Sheriff-Coroner

Response to FY 23-24 IOLERO Annual Report

The Sheriff's Office appreciates IOLERO's recognition of the efforts we've made over the past year to improve our Professional Standards Unit and the quality of our Administrative Investigations.

Policy Changes

Canine Policy

As noted by IOLERO in the Annual Report: "SCSO issued a revised Canine Policy 309 in January 2024. The revisions include linking canine use to the Use of Force Policy 300, adding provisions for using canines during warrant service or when a person is concealed, identifying circumstances when canines cannot be deployed, and requiring that a canine be released once there are adequate resources to take a person into custody."

While IOLERO and the CAC have expressed interest in further reviewing the Canine Policy, it is important to highlight that the recent changes incorporated most of the CAC AD HOC recommendations. Future recommendations should consider the unique role of Sheriff's canines, particularly in areas like the Sonoma Coast, where deputies may face extended response times, sometimes exceeding an hour. In such situations, the necessity of a canine may be greater than in local police departments where backup is more readily available.

The Sheriff's Office is continually evaluating the Canine Program for improvements. We recently issued an RFP for a new vendor to provide training to our Canine Unit, ensuring we follow best practices.

IOLERO Recommendations

Internal Affairs Investigations

In its FY 22-23 report, IOLERO recommended that SCSO adopt a formal policy concerning assignments to Internal Affairs Investigations to address potential conflicts of interest. Specifically, they recommended clearer guidelines for determining when an investigator's personal involvement or prior knowledge of an incident should disqualify them from conducting the investigation.

The Sheriff's Office has addressed this issue. Our Internal Affairs Investigations policy has been updated to ensure that any investigation involving a member of the command staff will be conducted by an external investigator. Moving forward, the Professional Standards Unit will evaluate all cases for potential conflicts of interest. This change occurred mid-year, so cases mentioned in next year's IOLERO Annual Report may reflect practices before this update.

Detention Facility: Strip Searches

IOLERO recommended that the Sheriff's Office review its policies and training to ensure staff are properly guided in conducting pat-downs and strip searches. We have reviewed these policies and provided additional training to ensure proper compliance by staff and supervisors.

Telephone Access

IOLERO suggested reviewing the practice of limiting telephone access for arrestees in sobering cells until their "partial" booking is completed, and evaluating whether it complies with Penal Code § 851.5 and SCSO Policy. The Sheriff's Office is currently reviewing this practice.

Telephone Signage

IOLERO also recommended reviewing telephone signage to ensure compliance with Penal Code § 851.5 and SCSO Policy. The Sheriff's Office has inspected sign locations and addressed the concerns outlined by IOLERO.

Body-Worn Camera (BWC) Activation at MADF

IOLERO recommended reviewing the BWC policy and training to clarify when BWCs should be activated. As outlined in the report, SCSO policy requires BWCs to be activated when a contact becomes adversarial. The policy aims to deter inappropriate comments, confirm appropriate conduct, and assist in administrative investigations.

However, it is impractical to require deputies to activate BWCs for every interaction with inmates due to the constant nature of such contacts in a detention setting. IOLERO acknowledged this, suggesting activation when interactions become confrontational is appropriate but offered no specific recommendations for what the exact "trigger" should be.

We will continue to monitor these situations to determine if further policy changes are necessary for clarity.

Preservation of Jail Video

IOLERO reviewed a case where MADF video footage was automatically purged. The Sheriff's Office has implemented measures to ensure the preservation of such video footage in the future.

Dispatch Policies/Procedures for Complaints

IOLERO reviewed a case where a deputy used dispatch records to learn about a complaint before an Internal Affairs investigation could begin. This allowed the deputy to identify the complainant and erase potentially incriminating evidence.

The IA investigator flagged this issue, recommending a modification of the dispatch policy to prevent similar incidents. The Sheriff's Office has since updated its procedures for entering complaints in the dispatch system and notifying supervisors.

We appreciate the efforts of IOLERO staff and the CAC for their recommendations and feedback over the last year. We look forward to continuing our collaborative relationship to enhance public safety services in Sonoma County.

Eddie Engram Sheriff-Coroner