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CONSTITUTIONAL POLICING UNIT

DALLAS POLICE DEPARTMENT

Limited Scope Review

Internal Affairs Division

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Executive Summary

A Limited Scope Review of the Internal Affairs Division

The Constitutional Policing Unit (CPU) initiated a Limited Scope Review of the Internal Affairs Division (IAD) in August 2024 and completed its analysis in November 2024. The objective of the review was to determine the average length of time for the IAD to conduct a Control Number Investigation and the average length of time of the subsequent Review and Recommendation Process.¹ The CPU also assessed the alignment of the IAD's internal controls with applicable standards—including City of Dallas Administrative Directive (AD) 4-09, Chief's Update 22-027, the Dallas Police Department (DPD) General Orders, and the IAD Standard Operating Procedures (SOP)—and recognized effective policing practices. Through its assessment, the CPU identified four findings and 17 corresponding recommendations for improvement. Each recommendation is intended to enhance internal controls, foster operational innovation, and promote data-driven decision-making.

Four findings emerged from the Limited Scope Review.

1. The General Orders and IAD SOP lack clearly defined terms, roles, responsibilities, and procedures.
2. Neither the General Orders nor the IAD SOP clearly address the IAD's process for collecting, maintaining, and reporting data necessary to hold members of the IAD accountable for meeting suspense dates and investigation timelines outlined in applicable standards.
3. Between 2018 and 2023, 68% of Control Number Investigations were “completed and ready for review by the Division Commander within 90 working days,” as specified in the IAD SOP.
4. Between 2018 and 2023, the median duration of the Review and Recommendation Process was 76 calendar days.²

The CPU identified 17 corresponding recommendations for improvement, summarized below.

- Revise the IAD SOP
- Revise the General Orders
- Automate Data Entry Processes
- Enhance Accountability Mechanisms
- Augment the IAD's Workforce with Professional Staff
- Implement Acting Commander Case Reviews in the Absence of Lieutenants
- Enhance Communications with Employees Under Investigation and Complainants
- Modify Division Referral Investigation Requirements
- Clarify and Expand Discipline Matrices
- Modify Written Reprimand Issuance Authority

The Interim Chief of Police reviewed this report and approved all recommendations for improvement in January 2025. The IAD is in the process of implementing these recommendations in collaboration with the CPU.

¹ This review was limited to and included only an evaluation of Control Number Investigation and Review and Recommendation Processes. Neither the quality, accuracy, nor integrity of individual Control Number Investigations was evaluated.

² The validity of Findings 3 and 4 is dependent upon the accuracy of the IAD's Control Number Investigation and Review and Recommendation Process processing data, which is manually entered, often retroactively, into IAPro – the database used by the IAD to track complaints, investigations, and disciplinary actions.

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BACKGROUND

Per the IAD SOP, “The Internal Affairs Division is a staff unit directly responsible to the Chief of Police. The Internal Affairs Division has the responsibility of conducting independent administrative investigations of allegations of misconduct against members of the Dallas Police Department. The procedures established for the handling of complaints assures the prompt and thorough investigation of incidents to determine if an administrative violation occurred by a preponderance of the evidence. The Internal Affairs Division ensures due process is afforded to all members of the Dallas Police Department in the discipline process when an allegation is sustained, and the member’s chain of command determines discipline is appropriate. These procedures are based on the premise that discipline is a function of command and a well-disciplined department is one which voluntarily and ungrudgingly conforms to all rules and orders.”

This Limited Scope Review supports the CPU’s mission to affirm that the Department’s internal controls align with recognized effective policing practices. Several consent decrees and settlement agreements resulting from investigations of law enforcement agencies conducted by the Civil Rights Division of the United States Department of Justice include provisions addressing police departments’ misconduct investigations and associated timeframes.

- **Baltimore Police Department – Consent Decree (2017):** “[In each misconduct investigation, investigators shall ensure that they:]...Complete their administrative investigations within 90 [calendar] days of the initiation of the investigation. Any request for an extension of time must be approved in writing by the Director of the OPR [Office of Professional Responsibility].”³
- **Yonkers Police Department – Settlement Agreement (2016):** “YPD shall complete all investigations of officer misconduct within forty-five (45) [calendar] days of the earlier of YPD’s receipt of a complaint or YPD’s discovery of alleged officer misconduct, unless the IAD Commander extends that deadline in writing at the written request of the assigned investigator prior to the due date. The IAD Commander may permit an extension of time of no more than thirty (30) days per extension, and shall not permit more than two extensions. The IAD Commander shall record, as part of the investigative file for the incident, his or her basis for granting or denying the request for extension.”⁴

³ [*United States of America v. Police Department of Baltimore City, et. al.*](#)

⁴ [*United States of America v. Yonkers Police Department Agreement*](#)

- **New Orleans Police Department – Consent Decree (2013):** “All administrative investigations conducted by PIB shall be completed within the time limitations mandated by state law and within 90 [calendar] days of receipt of the complaint, including assignment, investigation, review and final approval, unless granted an extension as provided for under state law or Civil Service exemption, in which case the investigation shall be completed within 120 days. Where an allegation is sustained, NOPD shall have 30 days to determine and impose the appropriate discipline, except in documented extenuating circumstances, in which case discipline shall be imposed within 60 days. All administrative investigations shall be subject to appropriate interruption (tolling period) as necessary to conduct a concurrent criminal investigation or as provided by law.”⁵
- **Portland Police Department – Settlement Agreement (2012):** “PPB and the City shall complete all administrative investigations of officer misconduct within one-hundred eighty (180) [calendar] days of receipt of a complaint of misconduct, or discovery of misconduct by other means. For the purposes of this provision, completion of administrative investigations includes all steps from intake of allegations through approval of recommended findings by the Chief, including appeals, if any, to CRC. Appeals to CRC shall be resolved within 21 days.”⁶

⁵ [*United States of America v. City of New Orleans*](#)

⁶ [*United States v. City of Portland*](#)

FINDING 1: TERMS, ROLES, RESPONSIBILITIES, AND PROCEDURES

The General Orders and IAD SOP lack
clearly defined terms, roles,
responsibilities, and procedures.

Applicable Standards

“Complete the [allegations of misconduct] investigation within 180 days, absent other applicable laws, provisions of collective bargaining, meet and confer, other agreements, or policies.” (State of Texas Model Policy: Misconduct Allegations, Texas Commission on Law Enforcement (TCOLE))

“Management should hold personnel accountable for performing their internal control responsibilities through performance appraisals and disciplinary actions.” (City of Dallas AD 6.1.5.1)

“Management should define objectives in specific and measurable terms that are clearly understood at all levels.” (City of Dallas AD 4-09 6.2.1.1)

“Management should develop control activity such as policies, procedures, techniques, and mechanisms to respond to the unit’s objectives and identified risks.” (City of Dallas AD 6.3.1.1)

“Management should periodically review policies, procedures, and related control activities for continued relevance and effectiveness in achieving the City’s objectives or addressing related risks.” (City of Dallas AD 4-09 6.3.3.2)

“[Department Directors shall:] Establish an organizational structure, assign responsibility, and delegate authority to achieve the City’s objectives.” (City of Dallas AD 4-09 5.1.1.3)

Definitions of Key Terms

The General Orders and IAD SOP lack definitions of key terms relevant to the Control Number Investigation and Review and Recommendation Processes. Examples include the following.

- Completed Investigation
- Control Number Investigation Beginning
- Control Number Investigation Conclusion

The absence of clear definitions for these and other critical terms creates ambiguity and complicates efforts to track compliance, hold staff accountable for procedural delays, and ensure timely investigations.

“Completed Investigation”

The lack of a standardized definition for a “completed investigation” proves particularly problematic. Chief’s Update 22-027, the General Orders, and the IAD SOP include conflicting definitions for the term, rendering it challenging to hold IAD staff accountable for failing to complete an investigation within any of the varying timelines specified.

- Chief’s Update 22-027 regarding the timeliness of investigations indicates a Control Number Investigation begins when “a case is assigned to an IAD investigator” and is “completed” when “chain of command staff recommendations [are] completed.” The Chief’s Update notes this process “must be completed within one year.”⁷
- The General Orders first indicate an investigation is complete when an investigating officer’s work is finished and summarized in a report that he or she will submit “to the Chief of Police through the Internal Affairs Division Commander.”⁸ However, General Order 507.03 indicates a Control Number Investigation is considered “complete” after the IAD Commander makes “a finding based upon evidence contained within the documentation” provided to him/her by the investigating officer. Possible findings include Unfounded, Exonerated, Not Sustained, Sustained, and Complete.⁹
- The IAD SOP first defines an investigation as complete in the section that outlines the purpose of the Operations Unit.¹⁰ The section indicates an investigation is complete when it is ready for the review of the IAD Division Commander: “All investigations should be completed and ready for review by the Division Commander within 90 working days.”¹¹ Later in the IAD SOP, different definitions

⁷ Chief’s Update 22-027

⁸ General Order 507.02

⁹ General Order 507.03.A

¹⁰ IAD SOP 205.01

¹¹ IAD SOP 205.01.C

for a completed investigation are provided, and it is noted that investigations resulting in “no sustained allegations” and those resulting in “sustained allegations” are considered complete at different times.¹² The IAD SOP states, “Investigations conducted by the Internal Affairs Division which result in no sustained allegations are considered complete when the Chain of Command of the accused employee has reviewed the investigation. Investigations resulting in sustained allegations are considered complete when the Chief of Police or Assistant Chief has acted on the complaint and corrective action has been communicated to the employee.”¹³

In addition, it is important to note that in May 2024 the TCOLE adopted a State of Texas Model Policy: Misconduct Allegations, indicating that agencies shall “complete the investigation within 180 days, absent other applicable laws, provisions of collective bargaining, meet and confer, other agreements, or policies.” Law enforcement agencies must adopt this model policy “or substantively similar policies” no later than June 1, 2025.¹⁴ However, it is important to note the term “complete” is not defined in the Model Policy and is left to the interpretation of each agency.

Investigation Timeline Metrics

Investigation timelines are inconsistently measured across relevant Department regulations. Chief’s Update 22-027 measures the length of the Control Number Investigation process in calendar days, noting each “must be completed within one year.” In contrast, the IAD measures investigation timelines and suspense dates in working days. For example, the IAD SOP specifies, “All investigations should be completed and ready for review by the Division Commander within 90 working days.”¹⁵ This inconsistency complicates the accurate analysis of processing times and makes cross-agency comparisons more challenging, as all law enforcement agencies covered by Texas Local Government Code Chapter 143 and the TCOLE¹⁶ utilize calendar days as the standard unit of measurement.

Inconsistent Use of Terminology

Terminology is inconsistently used within and across relevant sections of the General Orders and IAD SOP. Examples include the following.

- “Accused officer(s),” “employee,” and “accused employees” are used interchangeably in General Order 507.00.
- The report generated “upon completion of the [Control Number] investigation” is referred to as an “investigative summary report” in one section of the General

¹² IAD SOP 402.00.A

¹³ IAD SOP 402.00.A

¹⁴ <https://www.tcole.texas.gov/content/model-policies>

¹⁵ IAD SOP 205.01.C

¹⁶ State of Texas Model Policy: Misconduct Allegations, TCOLE

Orders,¹⁷ yet in another as the “conclusion report.”¹⁸ The IAD SOP, also presumably, references the same report in one instance as an “Executive Summary”¹⁹ and in another as “final investigative packets.”²⁰

- “External complaints” and “citizen complaints” are used interchangeably in the IAD SOP.²¹
- The terms “complete”²² and “approved”²³ are used to describe the same stage of the Control Number Investigation process in the IAD SOP.

The inconsistent use of terminology within and across relevant sections of the General Orders and IAD SOP can complicate IAD members’ and DPD employees’ understanding of relevant timeframes, processes, roles, and responsibilities.

Roles and Responsibilities

Some critical roles and responsibilities, such as those of the IAD Commander, are unclearly defined and inconsistently described across the IAD SOP and General Orders. For example, the IAD SOP specifies it is the “sole authority”²⁴ of the IAD Commander to determine which complaints will be investigated but does not specify who is responsible for classifying the allegations upon the conclusion of the investigating officer’s investigation. However, the General Orders indicate it is the IAD Commander who will “make a finding based upon evidence contained within the documentation.”²⁵ This introduces unnecessary confusion surrounding a responsibility central to Control Number Investigations, making it difficult for the IAD to hold the correct individual accountable for neglecting to make a finding.

Differing Procedures

Critical Control Number Investigation and Review and Recommendation Process procedures outlined in the General Orders, IAD SOP, and Chief’s Update 22-027, differ in some cases. For example, the beginning and conclusion of the Control Number Investigation and Review and Recommendation Processes differ across the General Orders, IAD SOP, and Chief’s Update 22-027.

¹⁷ General Order 507.02.O

¹⁸ General Order 507.03.B

¹⁹ IAD SOP 203.02.H.2

²⁰ IAD SOP 205.05.F

²¹ IAD SOP 401.00

²² IAD SOP 402.00.A

²³ IAD SOP 402.00.B

²⁴ IAD SOP 401.00.E.2

²⁵ General Order 507.03.A

Discrepancies in the Definitions of the Beginning and Conclusion of a Control Number Investigation Across the General Orders, IAD SOP, and Chief's Update 22-027

	Control Number Investigation Beginning	Control Number Investigation Conclusion
General Orders	IAD Commander Complaint Review/Control Number or Division Referral Number Assignment ²⁶	Chief of Police Review/Final Finding ²⁷
IAD SOP	Complaint Assigned Incident Type ²⁸	Records Management Unit Ensures IAPro Entries are Complete ²⁹
Chief's Update 22-027	Case Assigned to an IAD Investigator	Completion of Chain of Command Staff Recommendations

Discrepancies in the Definitions of the Beginning and Conclusion of the Review and Recommendation Process Across the General Orders, IAD SOP, and Chief's Update 22-027

	Review and Recommendation Process Beginning	Review and Recommendation Process Conclusion
General Orders	Employee Response Document Completion ³⁰	Hearing Held with the Chief of Police and Employee/Chief of Police Determines Discipline (Agrees with Demotion or Discharge Recommendation) ³¹
IAD SOP	Involved Employee Reports to Internal Affairs and Completes an Employee Response Document and Internal Statement ³²	Records Management Unit Ensures All IAPro Entries are Correct and Complete ³³
Chief's Update 22-027	<i>Not specified.</i>	<i>Not specified.</i>

²⁶ General Order 507.01.A

²⁷ General Order 507.03.D

²⁸ IAD SOP 401.00.B

²⁹ IAD SOP 402.00.G

³⁰ General Order 509.00.A

³¹ General Order 509.00.I

³² IAD SOP 402.00.H

³³ IAD SOP 402.00.Z

Differing investigation beginnings and conclusions across the three directives create discrepancies that hinder effective oversight of IAD staff compliance. Depending on which directive is referenced, staff may interpret the start of an investigation differently, complicating efforts to enforce timelines and meet suspense dates.

In addition, it is important to note that the IAD SOP excludes the three “updated standard operating procedures for cases” outlined in Chief’s Update 22-027 — an update distributed in September 2022 — regarding the beginning, conclusion, and required timeframe for completing a Control Number Investigation.

Incomplete, Illogically Sequenced, and Unclear Procedures

Neither the General Orders nor IAD SOP outline fully accurate or comprehensive Control Number Investigation and Review and Recommendation Process procedures. Examples include the following.

- The General Orders outline 14 procedures in the Control Number Investigation process, and the IAD SOP outlines 26 procedures.³⁴ The General Orders outline 15 procedures for the Review and Recommendation Process, and the IAD SOP outlines 25 procedures.³⁵ These discrepancies are expected, as the General Orders are intended to provide general guidelines, and SOPs are intended to provide specific details. However, members of the IAD and Records Management Unit (RMU) cited during a personnel interview additional procedures not documented in either the General Orders or the IAD SOP. For example, IAD staff members indicated that cases pending criminal investigations, a Grand Jury decision, civil litigation, Officer Involved Firearm Discharges, Military Leave, and Family Medical Leave Act leave are informally suspended once assigned to a detective and that an IAD representative periodically “checks in” to confirm the outcome of each. These procedures are not documented in the General Orders or IAD SOP.
- It is unclear if and how employees are notified about final disciplinary action determinations. General Order 509.00.G specifies an employee’s options following a determination by an Assistant Chief/Assistant Director that a Written Reprimand or summary discipline will be issued as the result of an Internal Affairs investigation. However, General Order 509.00 does not specify if/how the employee is notified following this determination. The IAD SOP includes just one reference to an employee notification process following the decision of the Chief of Police or Assistant Chief to reclassify the findings of an Internal Affairs investigation.³⁶

³⁴ Appendix C

³⁵ Appendix C

³⁶ IAD SOP 402.00.O

- The “ADMINISTRATIVE SECTION PROCEDURES” section of the IAD SOP³⁷ excludes additional critical administrative procedures that are documented in the “RESPONSIBILITIES AND DUTIES” section of the IAD SOP.³⁸ For example, the Control Number Investigation process outlined in the IAD SOP³⁹ excludes other procedures included in the list of responsibilities and duties assigned to positions such as the Lieutenant, Sergeant, and Detective. Examples include the following.
 - “[Lieutenant will] forward the reviewed investigation to the Records Manager for processing and check the ‘Forward’ tab, then select ‘Records Mgt. Review’ from the drop-down list.”⁴⁰
 - “[Sergeant will] review investigations and ensure they are grammatically and structurally correct.”⁴¹
 - “[Sergeant will] promptly submit complete, legible, detailed, written and final investigative packets to their Operations Unit Commander.”⁴²
 - “[Detective will] promptly submit complete and final investigative packets to their Sergeant.”⁴³

In addition, certain procedures in the General Orders and IAD SOP lack logical sequencing, are unclear, or are presented with conditional terms. Examples include the following.

- General Order 507.02.H specifies that prior to any questioning of the accused employee conducted as part of a Control Number Investigation, the employee will be presented with “a signed copy of allegations (either a letter or affidavit signed by the complainant or a letter of allegation from the detective) against him or her.” However, preceding procedures, such as General Order 507.02.E, outline steps required as part of the interview process.
- IAD SOP 401.00.B notes, “Incoming complaints are assigned the following Incident types in the Internal Affairs Database.” The following two procedures, IAD SOP 401.00.C-D, define “internal complaints” and “external complaints” and note how each is initiated or received. However, a complaint cannot be assigned before it is initiated or received. Given the order in which these procedures are presented, it is unclear how and when complaints are assigned an incident type in the Internal Affairs Database.

³⁷ IAD SOP 400.00

³⁸ IAD SOP 200.00

³⁹ IAD SOP 401.00

⁴⁰ IAD SOP 205.03.G

⁴¹ IAD SOP 205.04.E

⁴² IAD SOP 205.04.H

⁴³ IAD SOP 205.05.F

- General Order 507.01.C specifies that for “citizen written complaints received by mail,” a letter will be sent to the complainant that acknowledges receipt of the complaint and contains the Control Number assigned (if applicable), the name of the person responsible for conducting the investigation or inquiry, or the reason why an investigation will not be conducted. However, the General Orders do not clarify whether the same process applies for complaints submitted through other means, such as in-person appearances at the IAD or when a supervisor files a complaint on behalf of a citizen.⁴⁴
- General Order 507.02.I states, “At the conclusion of the interview, the employee may be required to submit a written internal statement covering the details of the incident. All internal statements will be taken on Internal Statement forms.” The inclusion of the word “may” suggests some employees will not be required to submit a written internal statement following any questioning conducted as part of a Control Number Investigation. The same General Order states, “If the detective determines a written internal statement is required...”; however, it is not explained how/when a detective should make this determination.

Incomplete, illogically sequenced, unclear, and conditional procedures included across the General Orders, IAD SOP, and Chief’s Update 22-027 could lead to the inconsistent application of procedures; increased training challenges; and delayed investigations. These conditions render it challenging to understand the proper workflow of each process and, were an IAD staff member to execute the procedures in the order in which they appear in the General Orders and IAD SOP, he or she could miss essential steps in the processes.

⁴⁴ IAD SOP 401.00.D.2

Recommendations

1.1 Revise the IAD SOP

- A. Develop and include at the beginning of the IAD SOP a “Definitions” section to clearly define key terms, such as “completed investigation.”
- B. Develop and include an “Investigation Timelines” section modeled after General Orders and SOPs from divisions in comparable police departments, including the Albuquerque Police Department. Include in this section investigation timelines and suspense dates measured in calendar days and in accordance with applicable standards, including the new model policy adopted by the TCOLE.
- C. Develop and include in the IAD SOP clear Control Number Investigation and Review and Recommendation Process procedures consistent with the IAD’s practices and Chief’s Update 22-027 (and listed in sequential order).
- D. Clearly define key roles and responsibilities part of the Control Number Investigation and Review and Recommendation Processes and update the IAD SOP accordingly.

1.2 Revise the General Orders: Ensure the General Orders governing the Control Number Investigation and Review and Recommendation Processes align with any changes made to the IAD SOP.

FINDING 2: DATA

Neither the General Orders nor the IAD SOP clearly address the IAD's process for collecting, maintaining, and reporting data necessary to hold members of the IAD accountable for meeting suspense dates and investigation timelines outlined in applicable standards.

Applicable Standards

"[It is the policy of the City of Dallas (City) to establish and maintain an internal control system designed to ensure:]...Reliable and complete data is obtained, safely maintained, and reported." (City of Dallas AD 4-09 1.1)

"Create a process to regularly assess the effectiveness of internal control by comparing actual results to expectations." (City of Dallas AD 4-09 5.1.5.1)

"Management should ensure the City's information systems support the objectives of completeness, accuracy, and validity of information processing. Additionally, management should consider backup, recovery, and continuity of operations plans." (City of Dallas AD 6.3.2.3)

"Management should obtain relevant data from reliable internal and external sources in a timely manner based on the identified information requirements." (City of Dallas AD 6.4.1.2)

"Each unit's Standard Operating Procedure will include a section on administrative reports, such as daily reports, monthly reports and annual reports. The Standard Operating Procedure entry will include:

A listing of all administrative reports.

A statement as to the person(s) or position(s) responsible for the formulation of the report(s).

A statement of the purpose of the report(s).

A statement of the frequency of the report(s).

A statement of the distribution of the report(s)" (General Order 202.06.A.4)

IAPro Database Maintenance and Data Entry Deadlines

The IAD SOP includes conflicting directives regarding the individual responsible for maintaining the IAD's IAPro database. For example, the IAD SOP notes that it is the duty of a Senior Office Assistant to perform “general maintenance of the IAPro database and Excel files maintained by the Records Management Unit,” including “enter[ing] the investigation into the EXCEL spreadsheet and forward[ing] [it] to the appropriate Lieutenant for assignment” and “updat[ing] the IAPro Database to reflect the Discipline issued.”⁴⁵ Another section of the IAD SOP indicates it is the responsibility of the Lieutenant to “Ensure that all investigations have been updated and are correct in the IAPro Database.”⁴⁶ Neither section provides specific deadlines for when the Senior Office Assistant or Lieutenant must complete these data entry tasks throughout the lifecycle of a Control Number Investigation. Additionally, an interview with personnel from the IAD and RMU revealed that, in practice, some IAD sergeants update the database in real-time but that, ultimately, it is the responsibility of one member of the RMU to log all relevant data in IAPro.

Without clear accountability for maintaining the IAPro database, the IAD cannot ensure accurate, current investigative records. In addition, inconsistent database maintenance could compromise case tracking and oversight within the IAD.

Manual and Electronic Data Collection

A combination of manual and electronic systems tracks pertinent data related to the Control Number Investigation and Review and Recommendation Processes.

The IAD SOP states, “The Records Management Unit will assign a control number to each investigation and log it into IAPro. All available information will be entered into the IAPro database including the assigned investigator.”⁴⁷ However, an interview with members of the IAD and RMU revealed that relevant Control Number Investigation and Review and Recommendation Process data is logged on an Investigative Chronology Sheet attached to each investigation case file and then manually, and often retroactively, entered into IAPro. IAD and RMU staff noted it is “rare” that the data included on the physical Investigative Chronology Sheet is consistent with the data manually logged into IAPro, including investigation “Stages” and “Tasks.” Given the IAD and RMU's reliance on a manual data entry process vulnerable to human error and an honor-based system, the IAD and RMU lack the ability to verify the completeness, accuracy, and reliability of their data.

⁴⁵ IAD SOP 203.04.A.1

⁴⁶ IAD SOP 205.03.F

⁴⁷ IAD SOP 401.00.E.5

Monitoring Suspense Dates and Investigation Timelines

The IAD lacks the comprehensive protocols necessary to effectively monitor real-time compliance with suspense dates and investigation timelines.

- The IAD SOP states that the Lieutenant is to “monitor suspense dates”;⁴⁸ however, it is unclear how or when the Lieutenant should perform this duty and the consequence(s) for failing to confirm that members of the IAD are complying with the division’s suspense dates and investigation timelines.
- The IAD SOP notes that “investigations exceeding the allowed suspense will require Division Commander notification”⁴⁹ and that “investigations exceeding one year will require notification to the Office of the Chief of Police.”⁵⁰ However, these procedures fail to note in which format and by when the Division Commander should be notified regarding an investigation exceeding the allowed suspense. IAD staff indicated this notification is made via the “Weekly IAD CompStat Report.” This report includes the following categories of information regarding cases currently being investigated by the IAD.
 - Cases Pending Completion
 - Total Investigation Status
 - Total Cases by Number of Days
 - Suspended Cases Pending Completion
 - Over 100 Days Status Report
 - Spreadsheet of Over 100 Days Report

However, the report excludes the following information necessary to hold personnel accountable for meeting suspense dates and investigation timelines.

- A clear breakdown of which investigations remain incomplete after 90 working days as required by the IAD SOP.⁵¹
- The name and rank of any IAD personnel who failed to complete their Control Number Investigation duties by the suspense dates outlined in the IAD SOP (e.g., Detective: 45 Days; Sergeant: 15 Days; Lieutenant: 15 Days; Records Management: 15 Days).⁵²
- Explanations of why suspense dates were not met.

In contrast, the Atlanta Police Department requires an investigator to report the status of an investigation to his or her supervisor every seven calendar

⁴⁸ IAD SOP 205.03

⁴⁹ IAD SOP 205.01.D

⁵⁰ IAD SOP 205.01.E

⁵¹ IAD SOP 205.01.C

⁵² IAD SOP 205.01.C

days and to submit in writing to the chain of command and to the Office of Professional Standards any extension requests.⁵³ The San Antonio Police Department requires an investigator to submit a memo explaining why he or she has not been able to complete the investigation within 45 days from the date assigned and then to update the case progression notes task with weekly progress reports explaining the delay.⁵⁴

- The “Internal Affairs Division Reports” section of the IAD SOP contains inaccurate and incomplete information. For example, one report listed in the IAD SOP is the “Monthly Compstat Status Report – First week of the month,” yet a member of the IAD indicated that the report is actually produced weekly for the IAD’s command staff and review of the Chief of Police.⁵⁵ In addition, the “Internal Affairs Division Reports” section of the IAD SOP does not list all reports generated by the IAD, such as the “Over 200 Days Report,”⁵⁶ which the IAD reported providing to the Planning & Crime Analysis Unit each month.

⁵³ Atlanta Police Department Policy Manual, Standard Operating Procedure 4.3.2.5

⁵⁴ San Antonio Police Department Standard Operating Procedures Internal Affairs 306.10

⁵⁵ IAD SOP 407.00.D

⁵⁶ IAD SOP 407.00

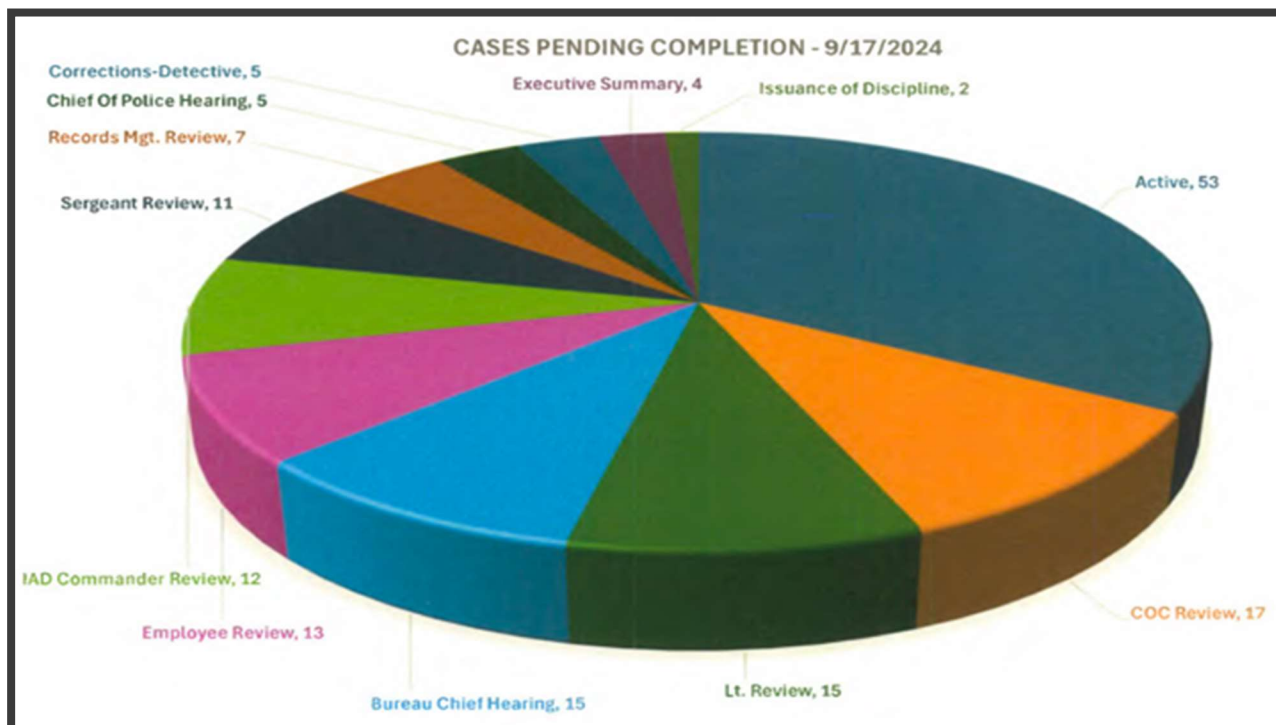


Figure 1: Weekly IAD CompStat Report (September 17, 2024)

To hold personnel accountable for meeting suspense dates and investigation timelines, the IAD must have clearly defined protocols that enable real-time monitoring of compliance. Without such protocols, the IAD cannot consistently ensure adherence to Departmental regulations. Reliable data is the cornerstone of accountability and operational effectiveness within the IAD, providing the necessary foundation for tracking timelines, identifying delays, assessing investigative performance, and building trust with stakeholders.

Accurate and consistent data entry, ideally achieved through automated systems with internal control mechanisms, enhances the IAD's ability to uphold procedural standards, accurately evaluate investigator performance, and transparently report investigation timelines. Reliable data not only protects individual accountability but also reinforces the department's commitment to transparency and procedural justice.

Recommendations

2.1 Automate Data Entry Processes

- A. Clearly define who is responsible for maintaining the IAD's IAPro database, establish data entry deadlines, automate pertinent data entry processes, and create internal controls to ensure accurate and consistent data entry.
- B. Update the IAD SOP and General Orders accordingly.

2.2 Enhance Accountability Mechanisms

- A. Update the "Internal Affairs Division Reports" section of the IAD SOP (407.00) in accordance with General Order 202.06.A.4 and determine if it is necessary to generate additional reports to monitor compliance with relevant Department regulations, including suspense dates and investigation timelines. For example, the IAD should consider preparing reports similar to those generated by the San Antonio Police Department.⁵⁷
- B. Develop a mechanism to effectively enforce compliance with established suspense dates and investigation timelines.

⁵⁷ San Antonio Police Department Standard Operating Procedures Internal Affairs

FINDING 3: CONTROL NUMBER INVESTIGATION PROCESSING

Between 2018 and 2023, 68% of Control Number Investigations were “completed and ready for review by the Division Commander within 90 working days,” as specified in the IAD SOP.⁵⁸

Applicable Standards

“Complete the [allegations of misconduct] investigation within 180 days, absent other applicable laws, provisions of collective bargaining, meet and confer, other agreements, or policies.” (State of Texas Model Policy: Misconduct Allegations, TCOLE)

“Create a process to regularly assess the effectiveness of internal control by comparing actual results to expectations.” (City of Dallas AD 4-09 5.1.5.1)

“All investigations should be completed and ready for review by the Division Commander within 90 working days” (IAD SOP 205.01.C)

Control Number Investigation Processing

An analysis of relevant data conducted by Criminologist in Residence Dr. Alex del Carmen⁵⁹ includes three key findings.

- 68% of Control Number Investigations were “completed and ready for review by the Division Commander within 90 working days,” as specified in the IAD SOP.
- 70% of detectives’ investigations are completed and ready for review by a sergeant within three months or less.

⁵⁸ IAD SOP 205.01.C

⁵⁹ Appendix B

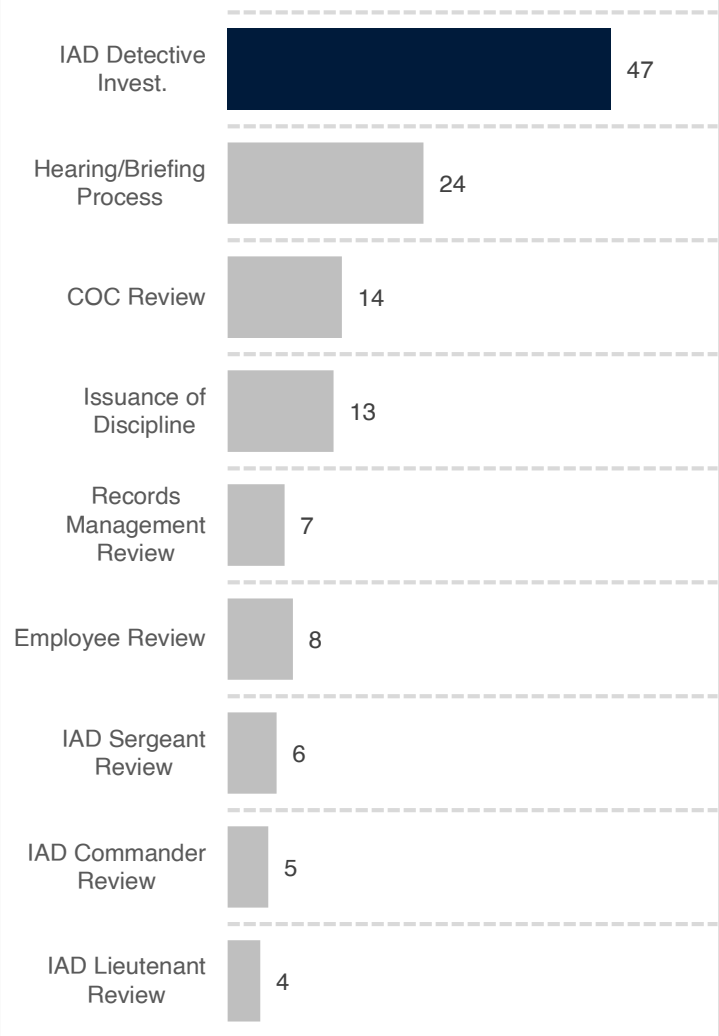
- The processing times of certain high-profile investigations involving entities such as the district attorney or medical examiner do sometimes require extended timeframes.
- This data challenges the widespread perception among Department members and the Dallas community that Control Number Investigations are unnecessarily prolonged. The disparity between perception and reality underscores the need for enhanced education about the Control Number Investigation process — such as the workflow, its distinction from the Review and Recommendation Process, and the separate roles of the IAD and RMU. Additionally, there is a need for increased transparency regarding investigation timelines and status updates. Currently, neither Department members under investigation nor complainants have a way to track the status of an investigation, which leads to frustration and undermines transparency.

Challenges and Inefficiencies

An interview with members of the IAD and RMU revealed the following challenges and inefficiencies related to the Control Number Investigation process.

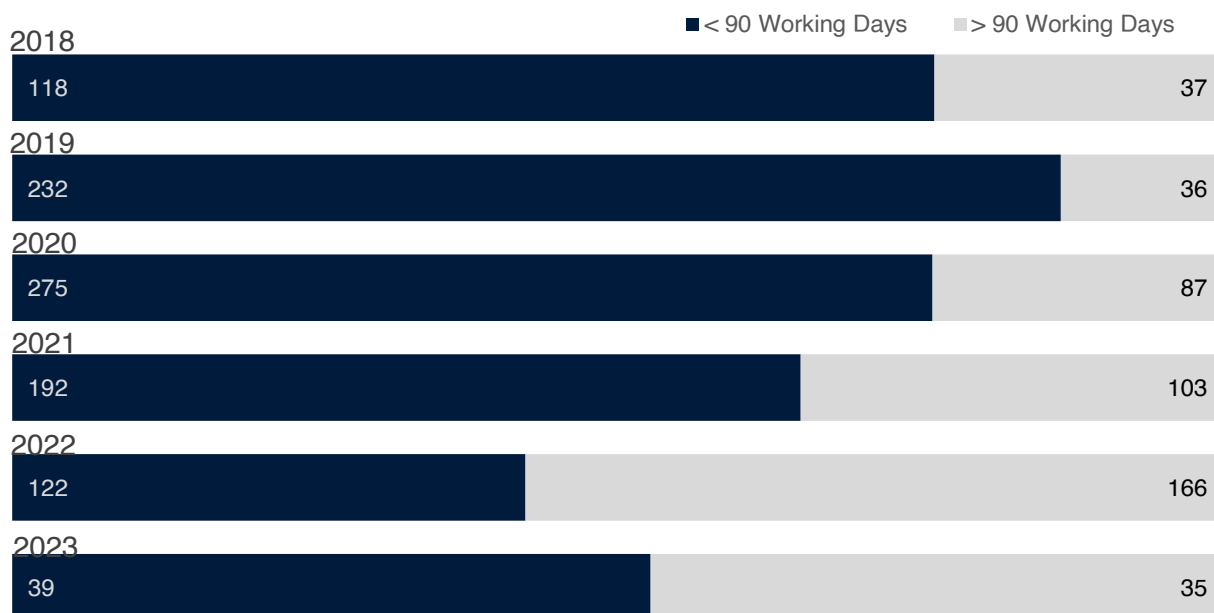
- It is challenging for the IAD to maintain full staffing levels,

The longest phase of the combined Control Number Investigation and Review and Recommendation Process is the IAD Detective Investigation, which has a median duration of 47 working days.



Source: DPD IAPro Data 2018-2023

Investigations are not always completed and ready for review by the Division Commander within 90 working days, per the IAD SOP.



Source: DPD IAPro Data 2018-2023

Figure 3

which impacts the timeliness of its investigations. The IAD reported on September 17, 2024, that five staff vacancies exist, including one lieutenant, one sergeant, and three detectives. The IAD noted that newly hired staff require time to reach full productivity due to the training period needed.

- Sworn personnel are responsible for conducting all IAD investigations, including standard human resources complaints, such as hostile work environment claims, sexual harassment, sick leave violations, and other administrative infractions. The involvement of sworn law enforcement officers is essential, given the landmark U.S. Supreme Court decision *Graham v. Connor*, which established that the "objective reasonableness" of an officer's actions must be evaluated from the perspective of a reasonable officer on the scene, not with the benefit of hindsight.⁶⁰ Sworn officers, with their practical knowledge and field experience, are uniquely qualified to apply this standard, ensuring that evaluations of use-of-force incidents are fair and aligned with policing realities. However, the CPU's analysis identified

⁶⁰ [Graham v. Connor ET. AL. \(1989\)](#)

358 unique Control Number Investigations conducted between 2018 and 2023 involving standard human resources complaints that could have been effectively investigated by professional staff with prior human resources experience or proper training. Multiple departments, including Albuquerque,⁶¹ Baltimore,⁶² and Seattle,⁶³ have initiated efforts to augment their IADs' workforce with professional staff. For example, the Seattle Police Department employs professional staff supervisors to manage complaint processing and conduct preliminary complaint screenings.⁶⁴

- The IAD Investigator's Manual outlines specific evidence that should be collected by detectives immediately, including 911/dispatch audio records, intake videos at the City Detention Center and the Lew Sterrett Justice Center, business surveillance videos, and call for service computer records.⁶⁵ In contrast, criminal investigative units within the DPD have begun leveraging Investigative Support Specialists to perform routine administrative tasks associated with criminal investigations, thereby preserving detectives' time for more critical aspects of an investigation and enhancing efficiency. This approach optimizes efficiency by allowing detectives to focus on more complex and high-priority aspects of investigations. Adopting a similar strategy within the IAD could enhance operational effectiveness by reducing administrative burdens on sworn investigators, ultimately leading to more timely and thorough investigations.
- IAD personnel said that sergeants tasked with assuming the responsibilities of the Operations Unit Commander (lieutenant) in the absence of the lieutenant⁶⁶ are unable to perform their case review function, which in some cases, extends Control Number Investigation processing times. However, the IAD SOP indicates that one of the primary duties of an IAD Operations Sergeant is to "assume responsibilities of the Operations Unit Commander when requested to do so, in the absence of the Operations Unit Commander."⁶⁷ One Weekly IAD CompStat Report⁶⁸ notes 15 cases pending completion due to "Lt. Review." Presumably, this delay could be reduced or eliminated were a sergeant able to perform the case review function in the absence of a lieutenant.

⁶¹ <https://www.governmentjobs.com/careers/cabq/jobs/newprint/4637702>

⁶² <https://www.baltimorepolice.org/civilianization>

⁶³ <https://www.seattle.gov/opa/about-us/meet-our-staff>

⁶⁴ Seattle Office of Police Accountability, Internal Operations and Training Manual

⁶⁵ Page 24, IAD Investigator's Manual (March 2018)

⁶⁶ IAD SOP 205.04.J

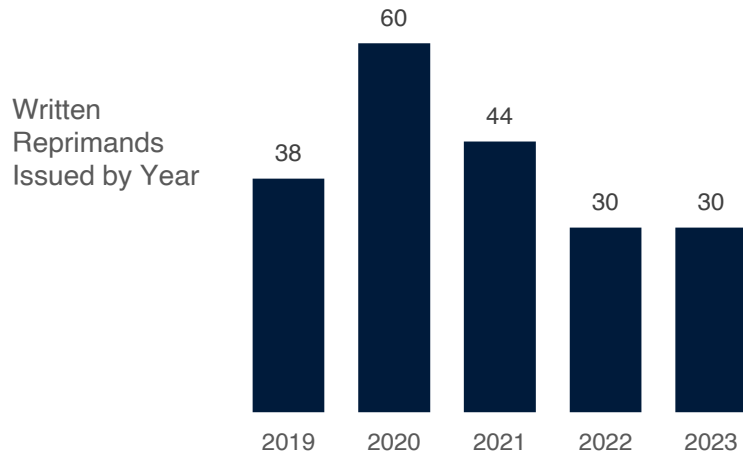
⁶⁷ IAD SOP 205.04.J

⁶⁸ September 17, 2024

- The classification of an investigation as either a Control Number Investigation or a Division Referral is determined by the IAD Commander, based on historical data related to typical disciplinary outcomes for each type of allegation. General Order 505.05.B states that the IAD Commander “has the authority to return a Request for Control Number to the Division for investigation if it is his or her determination that if SUSTAINED,

the punishment would result in Summary Discipline only. The request would then be assigned a Division Referral Number and returned to the Division for Investigation...” Request for Control Numbers that, if sustained, would result in Formal Discipline⁶⁹ — Written Reprimand, Suspension Without Pay, Demotion, and Discharge — proceed as Control Number Investigations. The CPU’s analysis identified more than 200 Control Number Investigations conducted between 2019 and 2023 that resulted in a Written Reprimand — the lowest level of formal discipline, defined as “a Formal Letter of Reprimand from a Division/Organizational Commander.”⁷⁰ In other words, these 200 investigations that resulted in the lowest level of Formal Discipline were handled by the IAD but could instead be investigated by the employee’s division. By revising the appropriate General Order to require Control Number Investigations only for allegations likely to result in penalties more severe than a Written Reprimand, the IAD’s workload could be significantly reduced, as these cases would be reclassified as Division Referrals and investigated at the division level.

Between 2019 and 2023, more than 200 Control Number Investigations resulted in Written Reprimands.



Source: DPD IAPro Data 2019-2023

Figure 4

⁶⁹ General Order 510.00.A.2

⁷⁰ General Order 510.00.A.2

Recommendations

3.1 Augment the IAD's Workforce with Professional Staff: Consider augmenting the IAD's workforce with professional staff to perform tasks such as investigating certain administrative complaints and managing complaint processing.

3.2 Implement Acting Commander ⁷¹ Case Reviews in the Absence of Lieutenants: Allow sergeants to perform the case review function in the absence of lieutenants.

3.3 Enhance Communications with Employees Under Investigation and Complainants

A. Share with involved employee(s) at the beginning of an investigation relevant Control Number Investigation and Review and Recommendation Process timelines.

B. Initiate the procurement of a software solution capable of providing real-time updates on the status of Control Number Investigations to facilitate timely communication with involved employees and complainants and enhance transparency.

3.4 Modify Division Referral Investigation Requirements: Revise General Order 505.05.B to require Control Number Investigations only for allegations that, if sustained, would result in penalties more severe than a Written Reprimand.

⁷¹ General Order 206.13

FINDING 4: REVIEW AND RECOMMENDATION PROCESSING

Between 2018 and 2023, the median duration of the Review and Recommendation Process was 76 calendar days.⁷²

Applicable Standards

“Complete the [allegations of misconduct] investigation within 180 days, absent other applicable laws, provisions of collective bargaining, meet and confer, other agreements, or policies” (State of Texas Model Policy: Misconduct Allegations, TCOLE)

“Agencies should ensure that their time limits include the taking of disciplinary action if necessary. Time limits must be in a specific number of days and may allow for extensions if requested and approved by the Chief of Police.” (Texas Police Chiefs Association Standard 2.05)

“Internal affairs investigations, from the time a case is assigned to an IAD investigator, to chain of command staff recommendations must be completed within one year” (Chief’s Update 22-027).

Review and Recommendation Processing

Not all internal affairs investigations, from the time a case is assigned to an IAD investigator, to chain of command staff recommendations, are completed within one year, as specified in Chief’s Update 22-027.⁷³ However, Dr. del Carmen reported, “A brief review of those cases indicates they are mostly complex high-profile investigations such as officer-involved shooting that resulted in the death of a suspect, custodial death

⁷² Appendix B

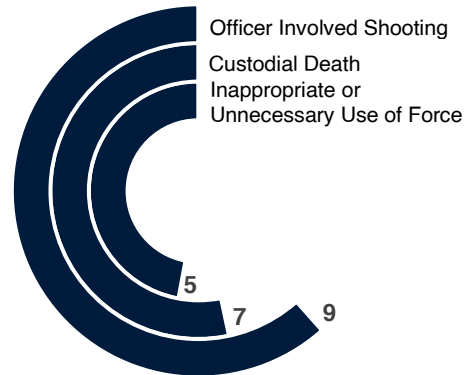
⁷³ Appendix B

investigations, and inappropriate uses of force. These types of cases may proceed slower than other cases if investigators must involve outside entities such as the district attorney, grand jury reviews, medical examination, etc.”

Challenges and Inefficiencies

- Members of the IAD and RMU concur they are in a “good place” with the Review and Recommendation Process but affirmed discipline hearing scheduling challenges prove the biggest delays, given the limited availability of the Department’s commanders. The median length of the Review and Recommendation Process is 76 calendar days. According to Dr. del Carmen’s analysis, pending disciplinary hearings account for the longest phase of the Review and Recommendation Process, with a median time of 32 calendar days.”
- Members of the IAD expressed uncertainty about applying existing discipline matrices. They questioned the necessity of disciplinary hearings for sustained allegations already covered by a matrix and noted cases where commanders conducted hearings instead of issuing discipline directly according

Three types of allegations account for half of all Control Number Investigations that take more than one year to process.



Source: DPD IAPro Data 2018-2023

Figure 5

Since 2018, the length of time to complete the combined Control Number Investigation and Review and Recommendation Process has been reduced.

Median Number of Working Days

Source: DPD IAPro Data 2018-2023

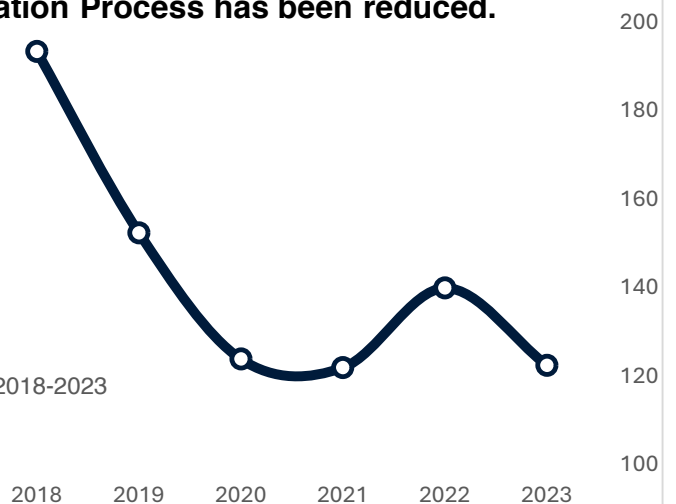


Figure 6

to established matrices for qualifying violations. Additionally, there is ambiguity about the proper use of certain matrices — for instance, whether two off-duty job violations in the same month should be counted as one or two separate violations.

- Compared to comparable police departments, the DPD has a relatively limited list of violations with an associated disciplinary matrix. The DPD's General Orders provide minimum discipline guidelines for only seven violations,⁷⁴ while the Austin Police Department provides disciplinary matrices for 49 different violations⁷⁵ and the Houston Police Department provides disciplinary matrices for 123 violations.⁷⁶
- Per General Order 510.01, a Written Reprimand is to be issued to an employee by a Division or Organization Commander at the direction of an Assistant Chief or Assistant Director.⁷⁷ However, this directive conflicts with two other General Orders that grant the authority to issue Written Reprimands to Bureau Commanders. The General Orders state, "In incidents that result in a Written Reprimand or Suspension, discipline will be issued to the employee by their Bureau Commander."⁷⁸ These conflicting directives cause confusion, and assigning issuance authority solely to Bureau Commanders, rather than Division Commanders, may delay the Review and Recommendation Process. By contrast, Dallas Fire-Rescue allows Written Reprimands to be issued at the station level, streamlining the process.

Recommendations

4.1 Clarify and Expand Discipline Matrices

A. Clarify the discipline matrix application process, including whether it is necessary for commanders to host a disciplinary hearing for sustained allegations already covered by a matrix.

B. Create discipline matrices for additional violations.

4.2 Modify Written Reprimand Issuance Authority: Revise General Order 510.00 to allow Division Commanders to issue Written Reprimands.

⁷⁴ General Order 510.01

⁷⁵ Austin Police Department General Order 903

⁷⁶ Pages 48-54, Houston Police Department Corrective Action Manual

⁷⁷ General Order 510.00.A.2

⁷⁸ General Order 510.01.F.10; General Order 510.01.G.10

APPENDIX A: OBJECTIVE, SCOPE, METHODOLOGY

Objective

The aim of the Limited Scope Review was to determine the average length of time for the IAD to conduct a Control Number Investigation and the average length of time of the subsequent Review & Recommendation Process. The CPU also assessed the alignment of the IAD's internal controls with applicable standards and recognized effective policing practices.

Scope

The Limited Scope Review covered the period between December 2016 and July 2023. It encompassed an evaluation of the processing times of all completed Control Number Investigations and the corresponding Review & Recommendation Processes.

Methodology

Limited Scope Reviews include focused assessments of specific regulations, functions, and operations within the Department. Each review employs a methodological approach, leverages internal and external subject matter expertise, and is informed by an evaluation of applicable standards and recognized effective policing practices. The goal is to identify targeted opportunities to enhance internal controls, foster operational innovation, and promote data-driven decision-making.

The Limited Scope Review of the IAD was conducted by a team of CPU personnel, including Dallas Police Officers, the Unit's Constitutional Policing Advisor, and DPD's Criminologist in Residence (Limited Scope Review Team). Between August 21, 2024, and September 27, 2024, the team leveraged a combination of quantitative and qualitative methods to achieve the review objective.

Quantitative

The IAD provided to the CPU a de-identified dataset with 33,324 records, including 22 data fields (listed below), related to all Control Number Investigations and each corresponding Recommendation & Review Process spanning the period of December 2016 to July 2023.

- | | |
|-------------------------|-------------------------------|
| 1. Inc: IA No | 12. Off: Badge/ID number |
| 2. Inc: Incident type | 13. Off: Title/rank |
| 3. Inc: Assigned date | 14. Alg: Allegation |
| 4. Inc: Completed date | 15. Alg: Finding |
| 5. Task: Created date | 16. Alg: Finding date |
| 6. Task: Task type | 17. Act: Action taken |
| 7. Task: Due date | 18. Act: Action taken date |
| 8. Task: Completed date | 19. Act: Days/hours suspended |
| 9. Task: Assigned to | 20. Inc: Classification |
| 10. Inc: Disposition | 21. Inc: Sub-Classification |
| 11. Off: Database row # | 22. Inc: Database row |

The dataset was provided to Criminologist in Residence Dr. Alex del Carmen, who “cleaned and structured the data for analysis,” resulting in a dataset containing 11,306 records. Dr. del Carmen analyzed the records to determine Control Number Investigation Processing Time, Review and Recommendation Processing Time, and Anomaly Analysis.

1. **Control Number Investigation Processing Time.** Each level of IAD processing (detective, sergeant, lieutenant, major, and records) is analyzed for efficiency. Then a total processing time is noted.
2. **Review and Recommendation Processing Time.** The total time it takes a case after the control number investigation was completed until the time the case is closed is calculated.
3. **Anomaly Analysis.** A summary of cases where Control Number Investigations exceeded one year to complete.⁷⁹

It is important to note that the validity of Dr. del Carmen’s findings is dependent upon the accuracy of the IAD’s Control Number Investigation and Review and Recommendation Process processing data. This data is manually entered, often retroactively, into IAPro — the database used by the IAD to track complaints, investigations, and disciplinary actions.

Qualitative

The Limited Scope Review Team conducted a desk review of applicable standards, including City of Dallas and DPD regulations; information resources provided by the IAD; regulations from divisions in comparable police departments across the nation serving populations of a minimum of 250,000; and information gathered during a personnel interview.

Applicable Standards

- State of Texas Model Policy: Misconduct Allegations, TCOLE
- Texas Police Chiefs Association Standard 2.05
- City of Dallas AD 4-09 (Latest Revision Date: October 1, 2015)

⁷⁹ Appendix B

- Chief's Update 22-027 (September 8, 2022)
- DPD General Orders (Revised: June 21, 2024)

Information Resources Provided by the IAD

- IAD SOP (Revision Date: February 29, 2024)
- IAD Investigator's Manual (March 2018)
- Detective/Supervisor Training Record (Revised: February 10, 2023)
- Over 200 Days Report (September 3, 2024)
- Weekly IAD CompStat Report (September 17, 2024)

Regulations from Divisions in Comparable Police Departments

- Albuquerque Police Department General Orders
- Arlington, Texas Police Department Internal Affairs Section Standard Operating Procedure Manual
- Atlanta Police Department Policy Manual, Standard Operating Procedure
- Austin Police Department General Orders
- Austin Police Department Internal Affairs Standard Operating Procedures 2024
- Charlotte-Mecklenburg Police Department, Interactive Directives Guide
- Denver Police Department, Operations Manual
- Detroit Police Department, Internal Affairs Standard Operating Procedure
- El Paso Police Department, Internal Affairs Division Operations Manual
- Fort Worth Police Department, Internal Affairs Section Standard Operating Procedure # IAD-SOP-02
- Houston Police Department Corrective Action Manual
- Kansas City Missouri Police Department Personnel Policy
- Louisville Metro Police Department, Standard Operating Procedures
- San Antonio Police Department Standard Operating Procedures Internal Affairs
- Seattle Officer of Police Accountability, Internal Operations and Training Manual

Personnel Interview

- Hosted on September 17, 2024; attended by members of the IAD and the RMU

In addition, the CPU presents its findings and recommendations for improvement based upon a consideration of recognized effective policing practices.

APPENDIX B: AN ANALYSIS BY DEL CARMEN CONSULTING, LLC

An Analysis of Dallas Police Department Internal Affairs Division Processing Time

By

Del Carmen Consulting, LLC

Introduction

At the request of the Dallas Police Department, Del Carmen Consulting was contacted to conduct a review of the department's internal affairs (IAD) processing system. The department sent a dataset containing 33,324 records that span the period of December 2016 to July 2023 in Microsoft Excel format. The department requested that we analyze the data for processing efficiencies. The methodology and findings are listed below.

Methodology

The raw data was retained in its original format and a copy of the raw data created in order to review for cleaning and structuring the data for analysis. After cursory review of the data, we noted the following:

1. **Missing Dates.** Some records had missing dates. Such records become problematic since Microsoft defaults to a date of 1/1/1900 for missing dates. Such a date would drastically skew statistical measures, thus records with missing dates were summarily dismissed.
2. **Wrong Dates.** Some records have wrong dates entered as evidenced in the fact that a task was completed before the date of the task was assigned. For example, if a task has an assigned date of 4/12/2023, but the date of task completion was 4/8/2023, this would indicate the task was completed four days prior to it being assigned. This results in a negative calculation of time. After bringing this to the attention of the department, they discovered that some dates had been manually entered by records personnel and not autogenerated by the IAPro software. Subsequently, the department wrote formulas to calculate task completion times that avoided negative time calculations.
3. **Duplicate Records.** Each case has an assigned control number. Each case may have multiple personnel under IAD review, and each personnel may be evaluated for multiple policy violations. Further, each case must be reviewed by several layers within the hierarchical structure of the department, both within the IAD and in other divisions. This results in cases which may have many (even hundreds) of data entries all connected to one control number. In

order to properly analyze the data, some concessions had to be made regarding duplicate data. As the focus of this analysis is on the Control Number Investigation processes, it was determined to structure the data to leave as many records related to IAD as possible. Thus, the records were set so that only one IAD personnel per review level remained for each case. For example, cases where an IAD detective was assigned to review a case that involved three personnel, each with three policy allegations would result in the same IAD detective being listed nine times on one case. If no cleansing and restructuring of the data was used, this would result in the time calculations being multiplied, in this case, nine times. Likewise, if an IAD sergeant or lieutenant also reviewed the case, it would result in nine entries for each IAD personnel in the review. Therefore, the duplication removal process eliminates all but one of those entries per each IAD personnel in order to capture the actual time spent on the case, rather than multiplying that amount of time by nine.

4. **Creation of New Variables.** As noted, the focus of the analysis is on the Control Number Investigation processes. Thus, a few variables were created to facilitate the analysis.
 - a. First, the department has a variable entitled Task Type, which shows the type of process each record was under. This variable was dichotomized to indicate whether it was a Control Number Investigation process, or a Review and Recommendation process. Control Number Investigation processes include the investigation and reviews by IAD personnel as well as records management. The Review and Recommendation processes include reviews by involved employee chain of command, civil service board, Loudermill hearings, etc.
 - b. Next, calculations showing elapsed time for various tasks were created. These calculations were later used for descriptive statistical purposes.
 - c. Finally, we also created a dichotomized variable to indicate whether the investigation resulted in official punitive actions (termination, suspension, reprimand, etc.) or non-punitive actions (exonerated, unfounded, not sustained, etc.). The use of this variable will be described later in this report.

After noting the concerns above, the department provided cleaned and structured data for analysis, with the resulting dataset containing 11,306 records. The records were analyzed for the following:

- **Control Number Investigation Processing Time.** Each level of IAD processing (detective, sergeant, lieutenant, major, and records) is analyzed for efficiency. Then a total processing time is noted.
- **Review and Recommendation Processing Time.** The total time it takes a case after the control number investigation was completed until the time the case is closed is calculated.
- **Anomaly Analysis.** A summary of cases where Control Number Investigations exceeded one year to complete.

Statistical Measures

Once all the calculations for the clean data were completed, the data was analyzed as follows:

1. **Mean.** The mean (average) Control Number Investigation processing time was calculated. The mean provides a general average of understanding the most common length to process each case.
2. **Median.** The median (50th percentile) of Control Number Investigation processing time was also calculated. The median indicates where the midpoint of the data lies, which communicates that half of the process take longer amounts of time to process, and half take less time to

process. When data is not normally distributed, the median can often be a more valuable measure than the mean.

3. **Standard Deviation.** The standard deviation of Control Number Investigation processing time was also calculated. The standard deviation provides a general measure of the dispersion of the data, with a small standard deviation indicating the data has a narrower range, and a larger standard deviation indicating the data has a broader range.
4. **Interquartile Range.** In addition to the median, the interquartile range also indicates where 50% of cases lie. The interquartile range is simply the difference between the third quartile and the first quartile.
5. **Minimum and Maximum.** The smallest (minimum) and largest (maximum) are also calculated.

Findings

After the department provided cleaned and structured data, as noted in the methodological section of this report, the analysis was conducted and the following is a summary of the findings.

Control Number Investigation Processing Time

Reviewing only those records which involved IAD tasks produces the data displayed in the following table.

Table 1 displays the descriptive statistical findings for processing times at each of the four levels of IAD review—detective, sergeant, lieutenant, and major—as well as the records management processing.

Table 1-Statistical Findings on IAD Processing Time¹

Measure	IAD Detective Time	IAD Sergeant Time	IAD Lieutenant Time	IAD Commander Time	Records Management Time
N	1461	1090	1374	1453	1394
Min	0	0	0	0	0
Mean	93	17	13	11	11
SD ²	100	28	53	19	13
Q1 ³	45	3	1	2	4
Median	64	7	4	6	9
Q3 ⁴	102	19	12	13	15
Max	1317	279	1684	520	225
IQR ⁵	57	16	11	11	11

In each of the five Control Number Investigation processing levels, the mean processing time exceeds the median processing time. This is an indication that the data is not normally distributed, but has a significant long right skew. Thus, mean (average) processing time is likely a poor indicator of Control Number Investigation processing time.

In the same manner, the standard deviation figures in Table 1 are somewhat large relative to the respective means and medians. This is also an indication of the long right skew to the data. This will become more apparent when the data is placed into histogram bins for visualization later in this report.

Thus, for purposes of the analysis in this report, the median and interquartile range (IQR) are better indicators of Control Number Investigation processing time. This table indicates that the median (50th percentile) time it takes IAD detectives to process an investigation is 64 days—just over two months. The median indicates that half the cases take less than 64 days, and the other half more than 64 days.

IAD sergeants are processing at a median rate of 7 days. After those two levels of review, the IAD lieutenants are processing at a median rate of 4 days, and IAD commanders at a rate of 6 days. Finally, records management is process at a median rate of 9 days.

The interquartile (IQR) findings are also worth noting. The IQR is the difference between the 25th percentile and the 75th percentile—and it is another manner of expressing how 50% of cases are processed. For example, the IQR for IAD detective processing time is 57 days, which is the difference between the Q1 45 days and the Q3 102 days. Thus, 50% of cases are completed by IAD detectives within 45 to 102 days.

¹ All statistical measures except number (N) are in number of days.

² Standard Deviation is a measure of how widely the data is distribute. It is an indication of how data is distributed about its mean.

³ First Quartile or 25th percentile.

⁴ Third Quartile or 75th percentile.

⁵ Interquartile Range is calculated as the difference between the first and third quartile. Fifty percent of cases occur between these two figures.

Limited Scope Review: Internal Affairs Division

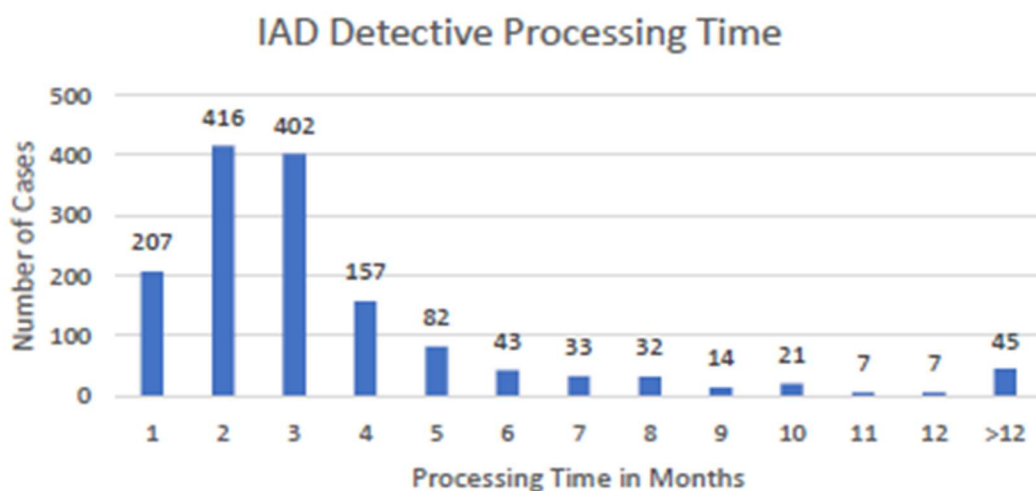
The IQR for IAD sergeants is 16 days, which spans between the Q1 of 3 days and Q3 of 19 days. The IQR for lieutenants and majors, as well as records, is about 11 days.

The IAD SOP requires that IAD detectives prepare a Control Number Investigation for the review of a sergeant within 45 days, unless extenuating circumstances warrant appealing for an extension. The findings in **Table 1** indicate that while IAD may be operating efficiently based on current staffing, the data shows that they are not always completing cases within the 45 days allotted by policy.

From **Table 1** it is not surprising to note that the majority of the processing time occurs at the IAD detective level. As they are tasked with the function of completing the investigation at the initial level of review, it is expected that their processing time would be longer than other levels. The maximum values at each level indicate that some rare cases have exceeded multiple years.

As noted earlier, the processing times for IAD personnel are not normally distributed—rather, the data

Figure 1-IAD Detective Processing Times



indicates a significant right skew. This is to be expected as only the most rare of cases would generate extremely long processing times. In order to visually display the long right skew, the data was parsed into 30-day intervals to show the time it takes to complete the various tasks assigned to IAD. The bulk of the processing time occurs at the detective level. When their data is structured for one-month (30-day) intervals and placed into a chart, the resulting histogram appears below in **Figure 1**.

Approximately 70% of cases are completed by IAD detectives within three months. And nearly 81% are completed in four months.

Review and Recommendation Processing Time

Upon completion of all levels of the Control Number Investigation process, each case is submitted to the involved employee's chain of command for disciplinary review. This is Review and Recommendation processing time where department personnel review the completed investigation and evaluate the findings against any applicable laws or policies. From the data provided by the department, the same statistical measures may be calculated for the various review levels outside of the Control Number

Investigation processing. The results are displayed in **Table 2**.

Table 2-Statistical Findings on Non-IAD Processing Time

Measure	Employee Review Time	CoC Review Time	Hearing Time	Discipline Time
N	1174	1367	733	508
Min	0	0	0	0
Mean	17	31	67	33
SD	27	42	109	68
Q1	6	11	16	9
Median	9	18	32	17
Q3	18	34	67	28
Max	412	635	1422	668
IQR	12	23	51	19

Similar to the Control Number Investigation process findings, the data in **Table 2** does not appear normally distributed as evidence by the significant disparity between the mean and median for each review level. However, as noted above, this is to be expected as in only the rarest of cases should there be an extremely long processing time.

Thus, again the mean is not a good indicator of processing time. A quick look across the board at the median figures at each review level indicate that cases appear to be processed rather efficiently. For example, the employee median review time was only 9 days. The longest median review time was at the hearing process level with 32 days and an IQR of 51 days.

Anomaly Analysis

Noting that extreme outliers are rare and that IAD typically completes many investigations within a few months, it may also be beneficial to review these anomalies for possible typological patterns. For this section, only those cases where a Control Number Investigation exceeded one year are analyzed.

When filtering the data for cases that exceeded one year of Control Number Investigation processing time, it is noted that there were forty-three (43) such cases. Twenty-one (21) of those cases were classified as either officer involved shooting (OIS), custodial death investigation, or inappropriate/unnecessary use of force. These account for half of the anomalous cases. Note the following:

- **Officer Involved Shooting (OIS).** Four of the OIS cases involved the death of the suspect. Given the nature of death investigations (OIS or custodial deaths), these cases can be complex with many moving parts and may also be at the mercy of external processes including District Attorney, Medical Examiner, and Grand Jury review. When all OIS cases in which a suspect was killed are analyzed, it is noted that the median processing time is 59 days, and the IQR is between 5 to 350 days. The median and Q3 figures exceed the 45-day processing policy, however, as indicated, these may be complex investigations with multiple external moving parts that factor into the processing period.

Custodial Death Investigations. Likewise, custodial death investigations had a median Control Number Investigation processing time of 29 days, and an IQR of 7 to 172 days. Thus, some custodial death investigations also exceeded the 45 days allotted by policy. Again, these can be complex investigations with external entities (District Attorney, Medical Examiner, Grand Jury, etc.). Based on the data provided by DPD, it is unknown what caused the cases in **Table 4** to exceed one year of processing time by IAD. This would require a more qualitative review by someone more familiar with the context of such cases.

- **Inappropriate or Unnecessary Use of Force.** Five of the anomalous cases involved use of force review. Although these cases exceeded one year of IAD processing time, the median processing time for all such cases was 25 days, with an IQR of between 4 days and 69 days.

The remainder of the anomalous cases appear to be one-off classifications and there was no other discernible typological pattern when reviewing them holistically. Further understanding of these cases would require qualitative analysis.

Table 3-Types of IAD Cases Exceeding One Year to Process

IAD Classification	Number of Cases
Shooting, Officer Involved	9
Custodial Death	7
Inappropriate or Unnecessary Use of Force	5
Administrative Inquiry	4
Failed to take proper action as a Supervisor	3
Equipment Misuse or Abuse	2
Place Person in Danger, Unnec.	1
Body worn camera policy violation	1
AWOL, Job Assignment	1
(blank)	1
Fail To Give Identification on Request	1
Negligence - Failed to secure loaded weapon	1
Failed to search a prisoner	1
Sexual Misconduct Off Duty	1
Accidental Discharge	1
Use of profane or indecent language	1
False report or citation	1
Disturbance, Escalating or Participating	1
Improper Conduct	1
Sum	43

Summary Findings

After structuring the data as seemed best for analysis, the findings are summarized here. Using median, rather than mean, as a benchmark to understand Dallas Police Department's Control Number Investigation processing time, the data indicates that most cases were completed in about three months. The majority of this time is borne by the IAD Detectives, who typically complete 70% of their cases in three months or less. The IAD SOP requires that IAD detectives prepare a Control Number Investigation for the review of a sergeant within 45 days, unless extenuating circumstances warrant appealing for an extension. The dataset provided by the department does not document extensions, thus, it is unknown if the department is compliant with their 45-day mandate.

Upon completion of all levels of review within IAD (including records management), the cases proceed to involved-employee divisions for disciplinary review. This Review and Recommendation procedure appears to operate fairly efficiently. The longest median time in Review and Recommendation processes comes from time spent on disciplinary hearings, with a median time of 32 days. Review and Recommendation processes include some functions which may be beyond the control of the department such as the time requisite to legally conduct a civil service review, the time required to issue discipline (including appeals processes), and time for public integrity reviews. Although the median Review and Recommendation processing times at each level are shorter than Control Number Investigation median processing times, as is to be expected, the Review and Recommendation time does include processing functions beyond the control of the department in order to properly dispose of cases requiring disciplinary actions. The data indicates that approximately 77% of cases resulted in disciplinary actions. Thus, the remaining 23% of cases were either not sustained, unfounded, or exonerated.

Finally, there are cases which exceeded one year of IAD processing time. A brief review of those cases indicates they are mostly complex high-profile investigations such as officer-involved shooting that resulted in the death of a suspect, custodial death investigations, and inappropriate uses of force. These types of cases may proceed slower than other cases if investigators must involve outside entities such as the district attorney, grand jury reviews, medical examination, etc.

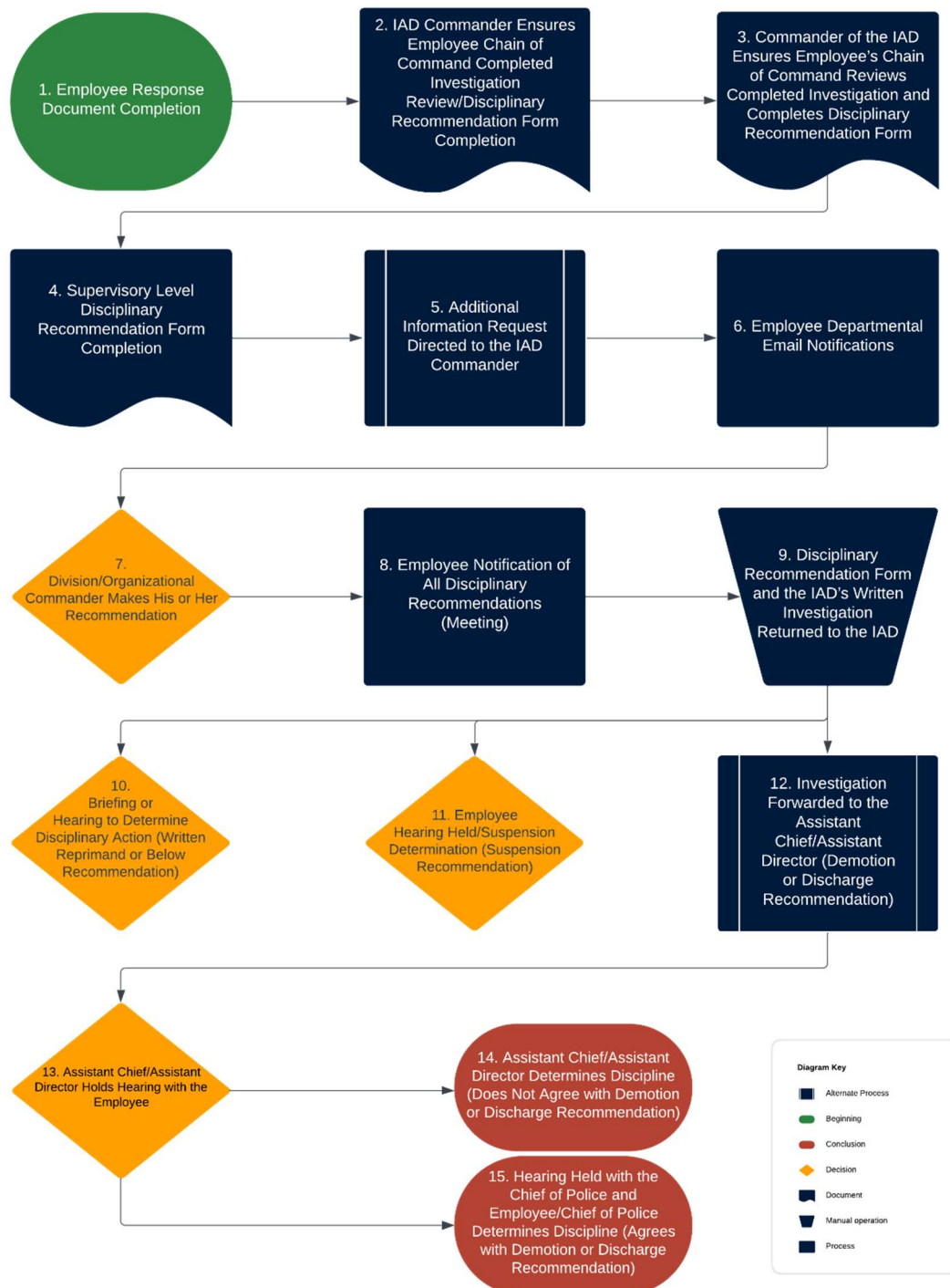
In summary, although there are some extreme cases which have exceeded one year for completion, the data appears to indicate that IAD completes most cases within 90 days, which is beyond the 45-day limit required by Dallas Police Department policy. It is possible that some processing of cases may be slowed by legal processes (civil and criminal). A qualitative review of anomalous cases and current staffing of IAD may provide more insight into its current operation.

APPENDIX C: PROCESS MAPS

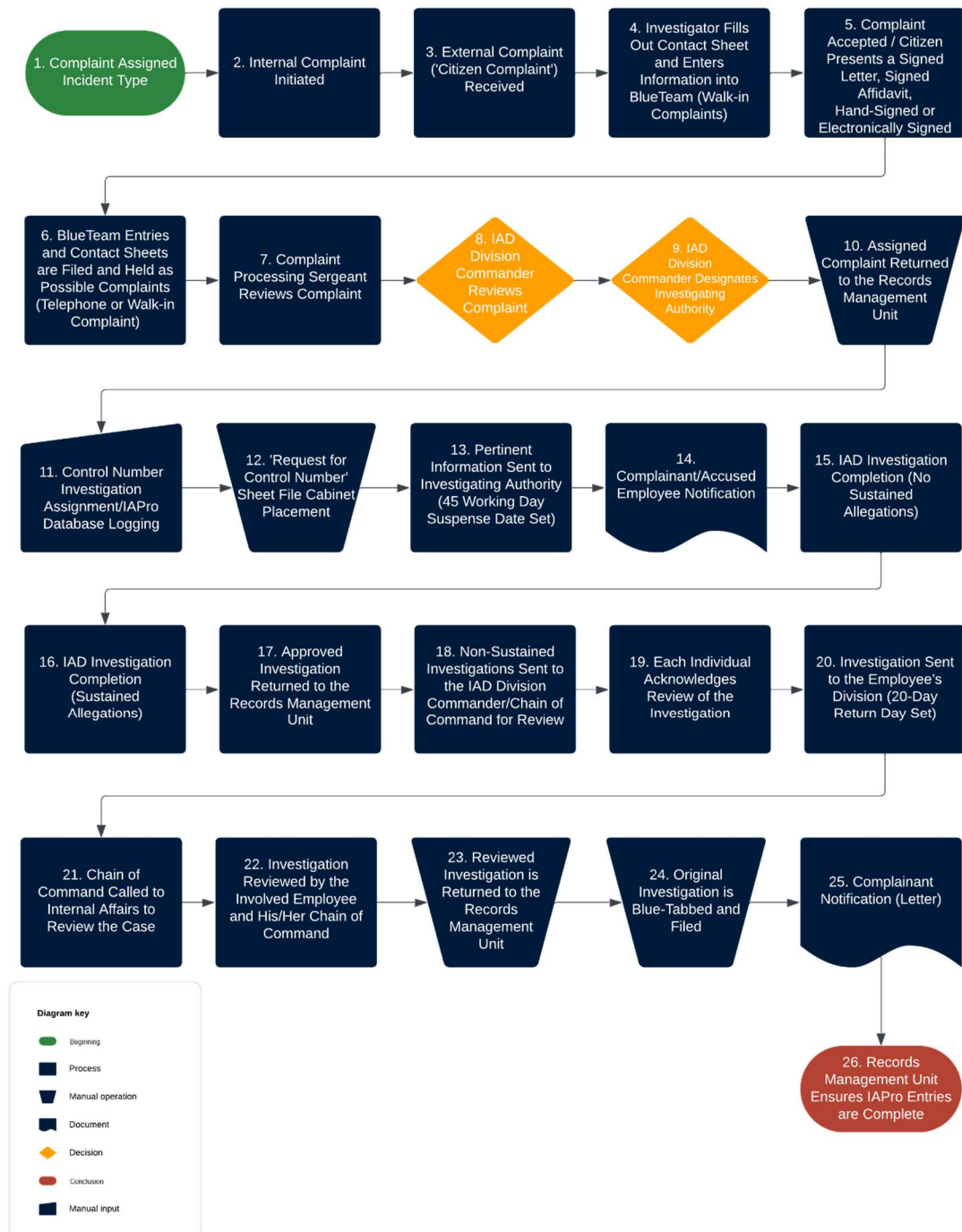
Control Number Investigation Process: General Orders



Review and Recommendation Process: General Orders



Control Number Investigation Process: SOP



Review and Recommendation Process: IAD SOP



APPENDIX D: GLOSSARY OF TERMS

Administrative Warning: “In all administrative investigations, the investigator and/or supervisor shall issue to the employees an Administrative (*Garrity*) Warning prior to any interview or request for internal statement.” (General Order 506.01.A)

Assistant Chief/Assistant Director: Assistant Chiefs and Assistant Directors possess a Bureau level of command. (General Order 100.02)

Blue Filing Process: No definition is included in the General Orders or IAD SOP.

BlueTeam Request for Control Number: “Any supervisor may initiate a request for investigation into an alleged violation of law, rules, or regulations of the Department. To initiate such a request, the supervisor will: a. Complete a Request for Control Number BlueTeam web entry giving a synopsis of the allegation”. (General Order 505.04.B.1)

BlueTeam System: A software application utilized by the Dallas Police Department to document a Response to Resistance, Foot Pursuit, Vehicle Pursuit, Consent to Search, Non-Consensual Search, Commendation, or Complaint.

Chief’s Update: “Chief’s Updates are messages from the Chief of police and are issued by the Public Information Officer to all members of the Department. The Chief’s Updates are utilized to communicate promotional announcements, important messages, current issues, and any other messages the Chief of Police wishes to send out department wide.” (General Order 202.01.L)

Citizen Written Complaints: Complaints submitted by citizens in written form, which are documented and processed by the department for investigation. (General Order 507.01.C)

Complaint Processing Sergeant: “The Complaint Processing Sergeant will be accountable for all complaints sent to the Internal Affairs Division. This includes all incoming complaints from Citizens and Internal Complaints via the BlueTeam system.” (IAD SOP 201.01.B)

Complete Finding: “The investigation established the facts of an Administrative Inquiry and determined that no violations of the rules occurred.” (General Order 507.03.A.5)

Conclusion Report: The Conclusion Report provides the outcome of the investigation with regard the rule, regulation or order which was violated. (General Order 507.03.B)

Contact Sheets: No definition is included in the General Orders or IAD SOP.

Control Number Investigation: “An Internal Affairs Control Number Investigation will be conducted based on allegations involving the commission of a criminal offense, serious misconduct or negligence in the performance of duty and whether if SUSTAINED, the punishment would result in discipline higher than summary.” (General Order 505.05.A)

Control Number: A unique identifier assigned to a formal Internal Affairs investigation for tracking and record-keeping purposes. (General Order 505.04.B)

Corrective Action: Corrective action is taken in response to sustained complaints, including summary and formal discipline. (General Order 510.00)

Dallas Police Department General Orders: The Chief of Police approves General Orders to establish general Departmental regulations, guidelines, or procedures; general regulations, guidelines or procedures affecting two or more bureaus; and specific responsibilities and/or duties. (General Orders 202.01)

Demotion: “Permanent reduction in rank or reduction in rank for a definite period of time.” (General Order 510.00.2.C)

Discharge: “Termination of employment.” (General Order 510.00.2.D)

Disciplinary Recommendation Form: The Disciplinary Recommendation Form is used by the involved employee’s bureau commander to document his disciplinary recommendation based on findings. (General Order 508.00.B.2)

Division or Organizational Commander: “The term ‘Organizational Commander,’ as used throughout the General Orders, refers to all Chief Officers/Directors and to any sworn Commander or Civilian Manager who commands/manages an organizational level assigned its own organizational number.” (General Order 100.04)

Division Referral Investigation: An investigation referred to the employee’s division rather than being handled by the Internal Affairs Division, typically for less severe infractions that would result in summary discipline instead of formal discipline. (General Order 507.06.B)

Division Referral Number: “Investigations that are classified as Division Referrals will have DR affixed to the Control Number and will be assigned to the involved employee’s division for investigation by the involved employee’s immediate supervisor or as directed by the involved employee’s Divisional Commander.” (General Order 507.06.A)

Employee Response Document: Employees submit a response document as part of the investigation process. (IAD SOP 402.00.H.5)

Executive Summary: No definition is included in the General Orders or IAD SOP.

Exonerated Finding: “The investigation revealed that the acts complained of occurred but were justified, lawful, and proper.” (General Order 507.03.A.2)

External Complaint: “Complaints received from citizens, regardless of where the citizen first reports the complaint, will be classified as an External Administrative Complaint.” (General Order 505.01.A)

External Investigation: No definition is included in the General Orders or IAD SOP.

Finding: “At the conclusion of an investigation or inquiry, any written report or memorandum generated will be reviewed by the Internal Affairs Division Commander. In Control Number Investigations, the Internal Affairs Division Commander will make a finding based upon evidence contained within the documentation. Possible findings include: [unfounded, exonerated, not sustained, sustained, complete].” (General Order 507.03.A)

Firearm Discharge: Any instance where an officer discharges a firearm, requiring immediate reporting for investigation. (General Order 317.07.A)

For Disciplinary Action Yellow Folder: Investigations leading to disciplinary actions are filed in the Yellow Folder. (IAD SOP 402.00.K)

Formal Investigation: No definition is included in the General Orders or IAD SOP.

Goldenrod: No definition is included in the General Orders or IAD SOP.

IAPro: The database “which receives Use of Force incidents, Summary Discipline, Requests for Control Numbers, Lost/Damaged Property Reports, Commendations, Pursuits, Searches, and Probation Failures, and is the system in which Division Referral Investigations are completed.” (IAD SOP 204.01.A)

Incident Types: Incoming complaints are assigned one of nine Incident types in the Internal Affairs Database: Investigation, External Complaint, External Investigation, No Investigation, Firearm Discharge, Vehicle Accident, Inquiry, Division Referral, or Public Integrity Referral. (IAD SOP 401.00.B)

Incoming Complaints: No definition is included in the General Orders or IAD SOP.

Inquiry: “To ensure the integrity of the Department and maintain the confidence of the citizen, it is sometimes necessary to conduct investigations into allegations of misconduct or mishandling of police incidents, even though the allegations do not meet the

requirements for making formal complaints as set out in General Order 502.00.” (General Order 507.04.A)

Internal Affairs Division Commander: No definition is included in the General Orders or IAD SOP.

Internal Complaints: “Internal complaints are when the complaint originates from a member of this Department.” (IAD SOP 401.00.C.1)

Internal Statement Form: An Internal Statement form is used to capture the employee’s statement. (General Order 507.06.G)

Internal Statement: A formal statement given by an employee during an internal investigation, used to determine the facts surrounding a complaint. (General Order 507.02.I)

Investigation is Completed and Classified: No definition is included in the General Orders or IAD SOP.

Investigation: An investigation involves the collection of evidence and statements to determine the validity of the allegations. (General Order 507.01)

Investigative Summary Report: No definition is included in the General Orders or IAD SOP.

Investigative Chronology Sheet: A form completed by the detective that documents the date and investigative activity performed during the investigation. (Internal Affairs Division Investigator’s Manual, March 2018)

No Investigation: No definition is included in the General Orders or IAD SOP.

Not Sustained Finding: “The investigation failed to disclose sufficient evidence to prove or disprove the allegation.” (General Order 507.03.A.3)

Original Investigation: No definition is included in the General Orders or IAD SOP.

Originals: No definition is included in the General Orders or IAD SOP.

Package: No definition is included in the General Orders or IAD SOP.

Probationary Status: The status of an employee who is still within their probationary period, often subject to different disciplinary standards. (General Order 509.00.C)

Public Integrity Referral: Complaints involving perjury; falsification of reports; solicitation of bribes; inappropriate handling of recovered/seized drugs, property or monies; associating with persons involved in criminal conduct; or any other conduct which could be considered abuse of office or authority will be referred to public integrity. (General Order 507.05.A)

Red “For Signature Only” Folder: “The Records Management Unit will prepare, for the Chief of Police or Assistant Chief’s signature, a termination or suspension letter addressed to the employee and a termination or suspension memo to the City Manager. These will be placed in a red “For Signature Only” folder and forwarded to the Chief of Police or Assistant Chief.” (IAD SOP 402.00.T)

Request for Control Number BlueTeam Web Entry: An entry into the BlueTeam Database giving a synopsis of the allegation that is used to initiate an investigation. (General Order 505.04.B.1)

Summary Discipline Appeals Board: Chief of Police appointed board comprised of two Chief-level officers and one Major-level officer to review appeals of Documented Counseling and Supervisor's Reports issued to employees. The board will review the summary discipline and related documents and make a written recommendation to the Chief of Police, or designated Executive Assistant Chief, to uphold, modify, or reverse the discipline. (General Order 511.02.B)

Summary Discipline: “Summary discipline provides immediate disciplinary action against employees who fail to conform to certain departmental standards of conduct and appearance. Summary discipline may be initiated by any supervisor and is imposed within the employee's chain-of-command by Advice and Instruction, Documented Counseling, or a Supervisor's Report of Correction.” (General Order 511.01.A)

Suspension Without Pay: Definite suspension of one or more working days. (General Order 510.00.A.2.b)

Sustained Finding: “The investigation disclosed a preponderance of evidence in support of the allegation made in the complaint.” (General Order 507.03.A.4)

Sustained Investigations: No definition is included in the General Orders or IAD SOP.

Sworn Personnel: "Article XVI, Section 1, of the Texas Constitution requires that all sworn officers will swear or affirm any oath required by state law or city ordinance before assuming law enforcement duties." (General Order 100.01.C.2)

Unfounded Finding: “The investigation determined that the act or acts complained of did not occur.” (General Order 507.03.A.1)

Vehicle Accident: Any incident involving a department vehicle may require an investigation, especially if it results injury or property damage. (General Order 302.06)

APPENDIX E: CONSTITUTIONAL POLICING UNIT RECOMMENDATIONS AND INTERNAL AFFAIRS DIVISION RESPONSES

For each recommendation, the IAD should indicate whether it concurs, does not concur, or partially concurs. If the IAD does not concur or partially concurs, it should explain why and provide additional context.⁸⁰

⁸⁰ The IAD provided its responses on December 10, 2024.

Limited Scope Review: Internal Affairs Division

	Constitutional Policing Unit Recommendation	Internal Affairs Division Response
1.1.A	Develop and include at the beginning of the IAD SOP a “Definitions” section to clearly define key terms, such as “completed investigation.”	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur
1.1.B	Develop and include an “Investigation Timelines” section modeled after General Orders and SOPs from divisions in comparable police departments, including the Albuquerque Police Department. Include in this section investigation timelines and suspense dates measured in calendar days and in accordance with applicable standards, including the new model policy adopted by the TCOLE.	<input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur Timelines based on other departments will be evaluated.
1.1.C	Develop and include in the IAD SOP clear Control Number Investigation and Review and Recommendation Process procedures consistent with the IAD’s practices and Chief’s Update 22-027 (and listed in sequential order).	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur

	Constitutional Policing Unit Recommendation	Internal Affairs Division Response
1.1.D	Clearly define key roles and responsibilities part of the Control Number Investigation and Review and Recommendation Processes and update the IAD SOP accordingly.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur
1.2	Ensure the General Orders governing the Control Number Investigation and Review and Recommendation Processes align with any changes made to the IAD SOP.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur
2.1.A	Clearly define who is responsible for maintaining the IAD's IAPro database, establish data entry deadlines, automate pertinent data entry processes, and create internal controls to ensure accurate and consistent data entry.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur

	Constitutional Policing Unit Recommendation	Internal Affairs Division Response
2.1.B	Update the IAD SOP and General Orders accordingly.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur
2.2.A	Update the “Internal Affairs Division Reports” section of the IAD SOP (407.00) in accordance with General Order 202.06.A.4 and determine if it is necessary to generate additional reports to monitor compliance with relevant Department regulations, including suspense dates and investigation timelines. For example, the IAD should consider preparing reports similar to those generated by the San Antonio Police Department.	<input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur Information will be evaluated and the need for further reports will be addressed on a case by case basis.
2.2.B	Develop a mechanism to effectively enforce compliance with established suspense dates and investigation timelines.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur

	Constitutional Policing Unit Recommendation	Internal Affairs Division Response
3.1	Consider augmenting the IAD's workforce with professional staff to perform tasks such as investigating certain administrative complaints and managing complaint processing.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur
3.2	Allow sergeants to perform the case review function in the absence of lieutenants.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur This already occurs when Sergeants TAP.
3.3.A	Share with involved employee(s) at the beginning of an investigation relevant Control Number Investigation and Review and Recommendation Process timelines.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur

	Constitutional Policing Unit Recommendation	Internal Affairs Division Response
3.3.B	Initiate the procurement of a software solution capable of providing real-time updates on the status of Control Number Investigations to facilitate timely communication with involved employees and complainants and enhance transparency.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur This idea is currently going through the technology approval process.
3.4	Revise General Order 505.05.B to require Control Number Investigations only for allegations that, if sustained, would result in penalties more severe than a Written Reprimand.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur

	Constitutional Policing Unit Recommendation	Internal Affairs Division Response
4.1.A	Clarify the discipline matrix application process, including whether it is necessary for commanders to host a disciplinary hearing for sustained allegations already covered by a matrix.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur
4.1.B	Create discipline matrices for additional violations.	<input type="checkbox"/> Concur <input checked="" type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur The current matrices will have to be consistently applied prior to new ones being created.
4.2	Revise General Order 510.00 to allow Division Commanders to issue Written Reprimands.	<input type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input checked="" type="checkbox"/> Partially Concur We are currently working to approve Written Reprimands through division referral investigations. This project is at the planning unit.

Contributing Constitutional Policing Unit Team Members

- Lieutenant Julio González, Constitutional Policing Unit Commander
- Maddy Madrazo, Constitutional Policing Advisor
- Police Officer Lynell Batemon, Constitutional Policing Analyst
- Dr. Alex del Carmen, Criminologist in Residence

Reviewed By

- Lindsay Gowin, City Attorney's Office Deputy Chief of Torts, City of Dallas
- Pavala Armstrong, City Attorney's Office Section Chief, Police Legal Liaison, City of Dallas



About the Constitutional Policing Unit

The Constitutional Policing Unit (CPU) was established in 2023 to ensure that the Dallas Police Department (DPD) preserves its integrity by upholding the highest standards of policing – legal, moral, and ethical. For the benefit of Dallas officers and communities, the Unit aims to reinforce the Department's commitment to transparency and continuous improvement; and affirm the alignment of the Department's internal controls with recognized effective policing practices. The CPU is committed to establishing the nation's premier framework for self-assessment and self-correction within a law enforcement agency with the goals of strengthening the DPD for the future, enhancing officer and public safety, and redefining the expectations of law enforcement.