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# MPD Policies Curb Influence from Hate Groups

March 18, 2025

A report by the Office of the District of Columbia Auditor



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# Executive Summary

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## Why ODCA Did This Audit

ODCA did this audit pursuant to the “Comprehensive Policing and Justice Reform Amendment Act of 2022.”<sup>1</sup> The law, passed in April 2023, directed ODCA to conduct a comprehensive assessment of whether Metropolitan Police Department (MPD) officers have ties to white supremacists or other hate groups that may affect their ability to carry out their duties fairly or may undermine public trust.

## What ODCA Found

- ODCA did not identify any significant ties or affiliations to hate groups that would seriously impact officers performing their duties.
- MPD met the District Personnel Manual’s requirements for screening applicants, but did not incorporate additional best practices for vetting applicants’ tattoos for affiliations with white supremacy or other hate groups.
- MPD did not update the keyword list for its pre-hiring social media screening tool.
- MPD did not implement two recommendations made by the Police Executive Research Forum (PERF): implement a policy on extremism and use an educational campaign on extremist groups and symbols.
- MPD did not fulfill the D.C. Code requirement to ensure all sworn members completed annual training that included recognizing and preventing biased-based policing, racism, and white supremacy.
- MPD’s post-hiring vetting of whether current members have ties to white supremacy or other hate groups is not consistent with best practices.
- ODCA’s review of complaints over a 5-year period in MPD’s complaint tracking system identified two incidents in which sworn members associated with the Proud Boys, both of which are already publicly known. It found no other affiliations.
- ODCA identified 24 incidents in the 5-year period that in ODCA’s view constituted bias or discrimination, most were reported internally and most were use of racially-charged language.
- MPD disciplined the officers involved in these sustained complaints or provided valid reasons for not imposing discipline such as separation from the agency.
- MPD’s early behavior identification system does not include certain allegation categories and does not assign required points for relevant complaints.
- MPD did not obtain documentation verifying members’ completion of early behavior intervention plans.

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<sup>1</sup> Comprehensive Policing and Justice Reform Amendment Act of 2022, L24-345 was effective from April 21, 2023, and codified at D.C. Code § 5-123.31 et seq. The requirement for this audit is found at D.C. Code § 5-123.32.

## What ODCA Recommends

- MPD should develop policies and procedures to verify applicants' self-reported tattoos as part of the screening process.
- MPD should develop a policy that ensures an MPD staff member(s) reviews and determines the frequency of when to update the behavior kit keyword list to include words and phrases related to white supremacy and other hate groups.
- MPD should follow PERF's recommendation and implement an extremism policy and educate the entire department on extremist symbols and groups.
- MPD should ensure its annual training plan offers the required hours of continuing education and training, including recognizing and preventing biased-based policing, racism, and white supremacy.
- MPD should update its tracking system to ensure it tracks and can produce reports of sworn members, active or inactive, who did not participate in training topics mandated by law.
- MPD should develop policies and procedures to vet sworn members for affiliation with white supremacy or other hate groups on a periodic or ongoing basis.
- MPD should update General Order 120.28 to include Office of Police Complaints (OPC) allegation categories and update the SSP system's indicator points for OPC sustained allegations to match the general order's SSP Indicator Chart.
- MPD should develop policies and procedures for documenting completed training and Metropolitan Police Employee Assistance Program (MPEAP) sessions that include where the documentation should be retained and for how long.

# Background

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## Comprehensive Policing and Justice Reform Amendment Act of 2022

In 2020, the Council of the District of Columbia passed the “Comprehensive Policing and Justice Reform Second Emergency Amendment Act of 2020,” B23-825 (2020 Act).<sup>2</sup> The 2020 Act was a direct response to the demands for greater accountability in policing following the murder of Breonna Taylor in Louisville, Kentucky, and George Floyd in Minneapolis, Minnesota. The 2020 Act expired 90 days after its passage.

In April 2023, the D.C. Council enacted the “Comprehensive Policing and Justice Reform Amendment Act of 2022” (2022 Act), a law that mostly reflected the 2020 Act.<sup>3</sup> It added a section which incorporated provisions from a bill previously introduced by D.C. Councilmember Janeese Lewis George entitled “White Supremacy in Policing Prevention Act of 2021.”<sup>4</sup> This section of the law directed ODCA to conduct a comprehensive assessment of whether MPD officers have ties to white supremacists or other hate groups that may affect their ability to carry out their duties fairly or may undermine public trust. Specifically, the section stated the assessment should investigate:

- Organizational affiliations and memberships.
- Social media engagement, including any published statements, photographs, or video footage.
- Sustained allegations of misconduct against the officers, as determined by MPD or the Office of Police Complaints (OPC).

## Metropolitan Police Department

MPD is one of the largest, local police departments in the United States and plays a primary role in maintaining public safety and law enforcement in Washington, D.C. Its mission is “to safeguard the District of Columbia and protect its residents and visitors with the highest regard for the sanctity of human life.”<sup>5</sup> MPD strives to accomplish its mission by focusing on service, integrity, and fairness by upholding the city’s motto “*Justitia Omnibus-Justice for All.*”<sup>6</sup>

Two bureaus in MPD are primarily involved in detecting whether applicants have ties to white supremacists or other hate groups and training, investigating, and disciplining current sworn members: the Professional Development Bureau and Internal Affairs Bureau (IAB).<sup>7</sup>

The Professional Development Bureau’s priorities are to ensure MPD hires the best applicants and

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2 This bill was titled the “second” emergency act because an earlier draft – B23-0774, the “Comprehensive Policing and Justice Reform Emergency Amendment Act of 2020” – was postponed indefinitely. See B23-0774, the “Comprehensive Policing and Justice Reform Emergency Amendment Act of 2020” (introduced June 8, 2020), <https://lms.dccouncil.us/Legislation/B23-0774>.

3 D.C. Law 24-345, effective April 21, 2023.

4 Bill 24-0112 introduced February 25, 2021. This bill was not enacted.

5 Office of the Chief Financial Officer, “2019 Proposed Budget and Financial Plan,” July 12, 2018, Volume 2, p. 546, [https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DCOCFO\\_FY19\\_Budget\\_vol\\_2.pdf](https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DCOCFO_FY19_Budget_vol_2.pdf).

6 Ibid.

7 MPD General Order (GO) OMA-101.10, “Organization of the Metropolitan Police Department (MPD),” dated March 10, 2022, page 3, a “bureau” is a major element of the department that manages field operations or provides other essential support functions. See: [https://go.mpdconline.com/GO/GO\\_101\\_10.pdf](https://go.mpdconline.com/GO/GO_101_10.pdf).

provides members with the best training and growth throughout their careers. The Bureau includes the Metropolitan Police Academy Division, Recruiting Division, and Disciplinary Review Division (DRD).<sup>8</sup>

The IAB is responsible for the accountability, implementation, and maintenance of MPD's reputation, integrity, and anti-corruption programs. The Bureau includes the Internal Affairs Division (IAD), Risk Management Division, and Court Liaison Division.

## **Office of Police Complaints**

The OPC is independent of MPD and receives, investigates, and resolves police misconduct complaints filed by residents against sworn officers of MPD involving harassment, inappropriate language, retaliation, unnecessary or excessive force, discrimination, failure to identify, and failure to intervene.<sup>9</sup> OPC also issues policy recommendations to the Mayor, D.C. Council, and Chief of Police. While OPC was not included as an audited agency in the audit, the audit team included its complaints in the complaint review because OPC has responsibility for investigating complaints against MPD officers for inappropriate language and discrimination.

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<sup>8</sup> Ibid. A "division" is a sub-element of a bureau or office that typically contains at least two sub-elements, which may be branches, sections, or units.

<sup>9</sup> D.C. Code § 5-1107, states OPC also receives, investigates, and resolves police misconduct complaints against the D.C. Housing Authority Police Department.

# Objective, Scope, and Methodology

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## Objectives

The objectives of the audit were to:

1. Assess whether current MPD officers have ties to white supremacist or other hate groups by evaluating internal and external complaints related to bias and discrimination and any publicly available evidence of past or current membership, association, or participation in any known hate groups.
2. Evaluate MPD's efforts to preclude the hiring of sworn officers affiliated with white supremacy and other hate groups.
3. Evaluate MPD's current and ongoing efforts to prevent sworn officers from becoming affiliated with white supremacy and other hate groups.

## Scope

The audit scope was October 1, 2018, to December 31, 2023.

## Methodology

To determine whether current MPD officers have ties to white supremacist or hate groups or have participated in incidents that may indicate sympathy with the views espoused by such groups, ODCA analyzed both internal and external complaints that MPD and the Office of Police Complaints received between October 1, 2018, and December 31, 2023. ODCA reviewed the complaint documentation and disciplinary review documentation (See Appendix A for a more detailed methodology of the audit team's complaint review process). The audit team also reviewed the early behavioral intervention assessments.

To evaluate MPD's efforts to preclude the hiring of sworn officers affiliated with white supremacy and other hate groups, ODCA undertook a comprehensive review of applicant records and hiring processes. ODCA reviewed 96 randomly selected applications from among 980 applications of individuals hired between October 2018 and December 2023. Additionally, ODCA reviewed ten disqualified applicants' applications. These 10 applications were chosen because the applicants affirmatively answered questions related to white supremacy or other hate groups.

ODCA also reviewed MPD's social media screening tool by reviewing applicants' social media reports. The audit team provided a list of 187 applicants who applied to MPD between September 2023 and December 2023<sup>10</sup> to FAMA Technologies,<sup>11</sup> the third-party vendor responsible for social media screening. FAMA Technologies reported it ran 63 applicants through its social media tool. The audit team reviewed the seven social media reports for applicants whose reports contained flags for harassment, intolerance, threats, crime, sex, cannabis, or other flagged keywords.

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<sup>10</sup> The audit team requested social media reports beginning September 2023 because FAMA Technologies began providing the service to MPD during that month.

<sup>11</sup> FAMA Technologies is a third-party vendor for Miller Mendel, Inc. and works directly with Miller Mendel, Inc.

To assess MPD’s ongoing efforts to prevent sworn officers from affiliating with white supremacy and hate groups, ODCA reviewed training materials for courses MPD identified as satisfying the requirements of D.C. Code § 5–107.02, which mandates that sworn members receive training in certain topics, including “[r]ecognizing and preventing biased based policing, racism, and white supremacy” annually. ODCA also reviewed data regarding the completion of training by sworn members. The review included the rosters of four training sessions conducted between calendar year (CY) 2021 and CY 2023. ODCA compared these rosters to the most accurate point-in-time human resource rosters of sworn officers at the end of CY 2022 and CY 2023, the two relevant calendar years, and identified which officers were missing from the various lists.

To gain insight into whether MPD members were aware of the audit topic, whether members feel MPD is taking steps to prevent or address any ties to such groups, and to reach a larger population at MPD than individual interviews, ODCA administered a survey to 3,859 current members,<sup>12</sup> including sworn and non-sworn employees. The survey was active for two weeks and ODCA received 307 responses.

ODCA also conducted 13 interviews with MPD employees and four interviews with MPD contractors and subcontractors. The audit team also met with a Councilmember, the Office of Police Complaints, stakeholders, and the California state auditor’s office, which had completed a similar audit. Additionally, the audit team reviewed D.C. laws and regulations, the District Personnel Manual (DPM), and MPD general orders (GOs) and handbooks, as well as the law of another state and other states’ audit reports related to white supremacy, other hate groups, bias, and discrimination.

This report was drafted, reviewed, and approved in accordance with the standards outlined in the ODCA Policies and Procedures Manual.

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<sup>12</sup> Six emails went undelivered in the process, and 3,859 were delivered.

# Audit Results

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ODCA's mandate was to determine whether MPD officers have ties to white supremacists or other hate groups that may affect their ability to carry out their duties fairly or may undermine public trust. With the exception of two individuals already publicly identified as having associated with the Proud Boys, we did not find such ties or significant influences.

MPD maintains a reporting system that tracks complaints made internally and those made by residents and others. We found that, over a five-year period, MPD had identified a relatively small number of officers who had sustained incidents involving bias or discrimination. Most involved the use of racially charged language, and a majority were reported internally. We reviewed these incidents on the assumption that language indicating bias could indicate sympathy with organizations that espouse hatred based on race, religion, ethnicity, sexual orientation or gender identity. We found the Department has disciplined those with sustained incidents of this nature and also has multiple initiatives underway to prevent such affiliations. ODCA additionally identified numerous ways MPD could strengthen these efforts to preclude influence from hate groups.

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## **MPD complied with extensive current requirements for screening applicants but did not incorporate additional best practices for screening applicants' tattoos for affiliations with white supremacy or other hate groups.**

According to the DPM,<sup>13</sup> prior to employment, each entry-level candidate for a police officer position must pass a physical and psychological examination, a truth verification test, and a background investigation, among other types of screening.

MPD's Special Order (SO) on "Social Media Checks for Background Investigations"<sup>14</sup> requires background investigators to check applicants' Facebook, Twitter (now known as "X"), LinkedIn, YouTube, and Instagram accounts. Any additional sites may be included in routine checks, but the order specifies they should be checked for all applicants to ensure consistency and fairness.

The audit team reviewed the applications for 96 individuals who were hired and found that all applications included the psychological screening, truth verification test, social media check, and completed background investigation report required by the DPM. As described below, each of these steps in the process included mechanisms to check for affiliations with white supremacy or other hate groups.

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<sup>13</sup> Chapter 8 DPM §§ 873.4 and 873.8.

<sup>14</sup> MPD, Special Order SO-16-06, "Social Media Checks for Background Investigators," dated June 3, 2016, [https://go.mpdconline.com/GO/SO\\_16\\_06.pdf](https://go.mpdconline.com/GO/SO_16_06.pdf).

The pre-employment background investigation questionnaires contained various questions related to membership or affiliation to white supremacy or other hate groups, and include the following:

- Are you now, or have you ever been, a member or associate of a criminal enterprise, street gang, or any other group that advocates violence against individuals because of their race, religion, political affiliation, ethnic origin, nationality, gender, sexual orientation or disability?
- Is there any derogatory information that MPD may find that you would like to offer an explanation for?
- Do you, or have you ever had, a tattoo signifying membership in, or affiliation with, a criminal enterprise, street gang, or any other group that advocates violence against individuals because of their race, religion, political affiliation, ethnic origin, nationality, gender, sexual orientation or disability?
- Please identify the nature of your tattoo(s), where it is located on your body, and the specific enterprise, gang, or group it represents.
- Do you have any objection to working with other officers, who may identify themselves as being gay, lesbian, bisexual, or members of the transgender community?
- Do you have any objection to interacting with members of the community, who may identify themselves as being gay, lesbian, bisexual, or members of the transgender community?
- Do you have any concerns working with other officers that may be of different racial/ethnic backgrounds (e.g., Muslim or Arabic)?
- Do you have any concerns working in a community with individuals from different racial/ethnic backgrounds (e.g., Muslim or Arabic)?
- Do you have any biases that would make you feel uncomfortable serving any portion of the community?
- Have you ever been accused of discrimination such as sexual harassment, racial bias, sexual orientation harassment, etc.) by a co-worker, superior, subordinate, or customer?

The application also included questions asking whether an applicant has been fired,<sup>15</sup> has received a less than honorable discharge from the military,<sup>16</sup> or has applied to or been employed by other law enforcement agencies.

The background investigation process asked each applicant's references whether he or she was aware of the applicant displaying any bias or prejudice. Additionally, the social media reviews included searches of applicants' social media.

The polygraph assessment focused on three general questions: 1) the applicant's drug history; 2) the applicant's criminal history; and 3) whether the applicant lied on the application. If the polygraph exam results were inconclusive or deception was detected, the polygraph examiner provided the candidate an opportunity to explain why those results occurred.

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15 DPM § 873.11(j) states that discharge from civilian employment two or more times within five years prior to application to MPD due to disciplinary action makes the applicant ineligible to become a police officer.

16 DPM § 873.11(g) states that a dishonorable discharge from military service makes the applicant ineligible to become a police officer.

The psychological assessment also included an assessment of the candidate's bias, a discussion on the applicants' tattoos, and whether the applicant had ever told a discriminatory joke. If the candidate was deemed not suitable, the psychologists would hold a marginal suitability conference<sup>17</sup> with the Recruiting Division to discuss the candidate, the psychological assessment results, and whether to reconsider the psychological rating.

MPD's background investigation process for an applicant who has tattoos included questions on the application for candidates to self-report their tattoos and to describe the location and size of the tattoo, the date the applicant got the tattoo, and its meaning.

MPD did not have policies and procedures for vetting candidate's self-reported tattoos. Recruiting Division representatives reported that they did not ask to see applicants' tattoos to verify any descriptions. The Police Fire Clinic (PFC) Associates LLC, the medical provider on contract to provide pre-employment physical examinations, reported that, although it may see applicants' tattoos during the physical examination, it did not document the applicants' tattoos or discuss the applicants' tattoos with MPD.

According to MPD representatives, they did not look at the applicants' tattoos because they believed doing so would be an invasion of privacy. According to PFC, it does not describe or discuss applicants' tattoos, and if it were a concern, MPD would let PFC know.

Although MPD has taken steps to mitigate the risks of hiring candidates with potential affiliations to white supremacy or other hate groups through questionnaires and truth verification tests, it could take an additional step to mitigate the risks by verifying tattoo meanings.

The U.S. Department of Defense (DoD) Inspector General established a best practice for screening tattoos when it conducted an audit<sup>18</sup> on military recruiting organizations' efforts to screen applicants for extremist and criminal gang behavior. The audit found that, as part of these efforts, each branch of the military has implemented policies and procedures for reporting tattoos (as a way to screen for, among other items, hate group symbols) varying from mandating that applicants provide pictures or drawings of tattoos, to requiring personal statements about tattoo meaning, to requiring approval of tattoos. When reviewing tattoos, applicants to any of these branches are not asked to undress for background investigators. Instead, a medical provider identifies and documents marks, scars, and tattoos during the medical examination. Each branch reviews and observes questionable tattoos and may utilize the Federal Bureau of Investigation (FBI) for assistance in identifying and analyzing questionable tattoos to determine potential meaning and significance.

The California Commission on Peace Officer Standards and Training (POST), which establishes the minimum selection and training standards for law enforcement in California, also established a best practice related to examining tattoos. California POST recommendations guide physicians to report any tattoos that are affiliated with criminal organizations, are racist, or have been removed. It provides

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17 An applicant is rated marginally suitable if "[t]here are significant concerns that psychological traits and behavior patterns may interfere with the performance of essential job functions. The Department should determine whether other data supports these concerns prior to making a final hiring decision."

18 Inspector General of the United States Department of Defense, "Audit of the Military Service Recruiting Organizations' Efforts to Screen Applicants for Extremist and Criminal Gang Behavior," dated August 3, 2023, <https://media.defense.gov/2023/Aug/07/2003276219/-1/-1/1/DODIG-2023-103.pdf>.

medical examiners with a medical form template that includes a section to report the presence of tattoos, and indicate if a tattoo is gang-related, racist, or has been removed.

Failing to screen and verify applicants' self-reported tattoos in the pre-hiring process is a missed opportunity for MPD to mitigate the risk of hiring and identifying an applicant associated with white supremacy or other hate groups. The lack of tattoo verification could lead MPD to hire an applicant with a tattoo that has associations with white supremacy or other hate groups, which could have negative effects and harm MPD's reputation in the community. Further, if MPD employees are aware of negative tattoos, it may signal that the department tolerates these offensive behaviors.

## Recommendation

1. MPD should develop policies and procedures to verify applicants' self-reported tattoos as part of the screening process.

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### **MPD did not update the keyword list for its pre-hiring social media screening tool, resulting in an increased risk of overlooking relevant insight into sworn applicants' suitability.**

The Standards for Internal Control in the Federal Government, known as the Green Book,<sup>19</sup> sets internal control standards for federal entities and may also be adopted by state, local, and quasi-governmental entities. Internal control is the process that management uses to help an entity achieve its objectives. It helps an entity run efficiently and effectively, report reliable information, and comply with laws and regulations.

The Green Book<sup>20</sup> states management should identify, analyze, and respond to significant changes that could impact the internal control system.

MPD did not update its keyword list for screening applicants' social media despite a request for MPD's input from the contractor. MPD contracted with Miller Mendel, Inc. (MMI) to provide it with electronic Statement of Personal History (eSOPH), a web-based software system to assist with pre-employment background investigations, safeguard personal identifying information, and monitor application status and eligibility. In October 2022, MPD amended the contract to include Social Intelligence Corporation (SIC), later acquired by FAMA Technologies, to provide internet and social media background screening and/or monitoring of applicants.

MPD's Special Order (SO) for "Social Media Checks for Background Investigations," states that derogatory information "obtained through social media checks shall be factored into the final hiring decision; however, information obtained shall not be used as the sole reason to disqualify an applicant." The SO

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19 U.S. Government Accountability Office (GAO), Standards for Internal Control in the Federal Government, GAO-14-704G, published September 10, 2014.

20 Ibid, see p. 42.

further states a similar prohibition on using photographs as the sole reason for disqualification and specifics that “[a]ny photographs used to substantiate engagement in derogatory activities must be corroborated with additional investigation.”

The social media behavior kit includes nine categories of behavior,<sup>21</sup> which are the automatic screening criteria examined during the social media screening process. The “intolerance” behavior screens for “prejudice on the basis of characteristics, such as race, gender, sex, sexual orientation, and national origin; use of bioted [sic] symbols and images” and does not screen “mainstream political beliefs” or “civil political discourse.”

The behavior kit also includes a customizable list of keywords and phrases. MPD’s keyword list included 125 keywords and phrases such as “skinheads,” “ku klux klan,” “confederate hammerskins,” “KKK,” “the order,” “proud boys,” “white aryan resistance,” “combat 18,” and “atomwaffen.”

In August 2023, the President of Miller Mendel emailed two MPD officials requesting MPD’s input on what keywords should be used to screen applicants’ social media presence. According to MMI, MPD did not respond to the email.

The keyword list was never updated because one of the two MPD officials who received the email from the contractor believed the other MPD official was the point of contact and did not respond. We were unable to determine why the second MPD official failed to respond to the contractor because he is no longer active in MPD.

Between September 15, 2023, and December 31, 2023,<sup>22</sup> 63 applicants’ social media were screened.<sup>23</sup> Two (2) applicants were flagged for intolerance, and five (5) applicants were flagged because their pages included keywords on the original list.

The two applicants flagged for intolerance “liked” posts that contained profanity and were both disqualified due to a failed psychological examination or because they were not best qualified.

Four of the five applicants flagged for keywords that included 81, the order, ad, ha, af, bd, and 318 were disqualified for other reasons, such as a failed psychological test or their criminal history. MPD hired one of those applicants. This applicant was flagged for the word “ha,” which the subcontractor labeled as “no concern.”

According to the Southern Poverty Law Center,<sup>24</sup> the number of hate groups decreased in the District of Columbia between 2018 and 2023, but the number increased in Virginia and Maryland. In addition to the changing numbers and names of hate groups, hate group vocabulary and symbols are constantly evolving, making it critical for any screening software to stay current on these trends.

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21 The behaviors are community engagement, sex, intolerance, violence, cannabis, other drugs, crime, harassment, and threats.

22 The time frame was chosen because it is around the time FAMA began running social media reports to the end of our scope, December 31, 2023.

23 Some applicants during the period were screened by SIC, while other applicants did not make it to the phase in the process to have a social media report.

24 Southern Poverty Law Center, “Hate Map,” <https://www.splcenter.org/hate-map>.

A lack of a curated and up-to-date keyword list could result in MPD mistakenly hiring an applicant who has posted, liked, or shared information associated with white supremacy or other hate groups if that applicant is using terminology that is more recent than the originally curated keyword list.

Having an active, sworn member's social media contain information that created the appearance that he or she was sympathetic to white supremacy or other hate group ideologies may make residents question whether the member is biased and whether all residents will be treated equally under the law, eroding public trust and potentially bringing discredit to the member or MPD at large. It could also affect the member's credibility in investigations.

## Recommendation

2. MPD should develop a policy that ensures an MPD staff member(s) reviews the behavior kit keyword list and include in that policy the frequency of when to update the list to ensure current words and phrases related to white supremacy and other hate groups are listed.

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### **MPD did not implement two recommendations made by the Police Executive Research Forum: implement a policy on extremism and use an educational campaign on extremist groups and symbols. This hindered MPD's ability to educate the department on extremism and track incidents related to extremism.**

In June 2021, former MPD Chief Robert Contee III (Chief Contee) commissioned an organizational review of MPD and contracted with the Police Executive Research Forum (PERF), an independent research organization directed by city chiefs and other practicing law enforcement leaders. PERF focuses on critical issues in policing through research and management studies of individual law enforcement agencies. Chief Contee wanted the review to focus on MPD's management practices, internal investigation procedures, opportunities for employee advancement, and hiring practices to determine whether any policies and procedures could be improved.

In MPD's initial response to the final PERF report, it indicated the main motivations for commissioning the review were the reports of law enforcement officers' participation in the insurrection at the U.S. Capitol on January 6, 2021, and to explore the issues of extremism in law enforcement and develop a strategy for addressing it.

In March 2023, PERF issued a final report<sup>25</sup> following a cultural assessment of the MPD workplace. The report included seven recommendations for MPD related to extremism and a framework for how agencies can address the issue.

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<sup>25</sup> Police Executive Research Forum, "A Cultural Assessment of the MPD Workplace," published March 2023, [https://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/publication/attachments/PERF%20MPD%20Cultural%20Assessment\\_032923.pdf](https://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/publication/attachments/PERF%20MPD%20Cultural%20Assessment_032923.pdf).

By December 31, 2023, MPD had five of the seven recommendations in place, but had not implemented two of the framework recommendations. The first non-implemented recommendation involves creating a clear policy that defines extremism and outlines what is and is not permitted. The second non-implemented recommendation involves using an educational campaign to increase knowledge and awareness of extremism. Specifically, the report recommended that the Chief of Police introduce a campaign with a strong statement of support and include information about extremist groups and symbols and a discussion of the prevalence of extremism in law enforcement, as well as the department's policy and how to report concerning behavior.

## Extremism Policy

MPD's current GO 201.26 "Duties, Responsibilities, and Conduct of Members of the Department"<sup>26</sup> states, members shall "conduct their private and professional lives in such a manner as to avoid bringing discredit upon themselves, MPD, or the District of Columbia." The GO further outlines that members should avoid regular or continuous associations with people or places that are under criminal investigation or have a reputation in the community for felonious activity and should not commence personal relationships with people who have been convicted or arrested multiple times. The GO does not specifically address white supremacy or other hate groups.

Chief Pamela A. Smith (Chief Smith) proposed an extremism policy in July 2023 that specifies that members should not engage in extremist activities or affiliate themselves with, or support through words or actions, extremist organizations. The draft policy defines extremist organizations and activities and domestic and international terrorism. The policy would also create an extremism category in the Personnel Performance Management System (PPMS), MPD's system to track investigations, and would direct the Recruiting Division and Human Resources to ensure adequate screening measures are in effect to prevent candidates with affiliations to extremist groups or participating in extremist activities from being hired.

## Educational Campaign

MPD has taken initial steps to create and use an educational campaign to increase knowledge and awareness of extremism, but those steps occurred after December 31, 2023. In October 2024, MPD issued a message through roll call forbidding employees from "joining, supporting, or advocating for any hate group, paramilitary gang, or other criminal organization" and declaring that "[a]ny affiliation with or practice of racist or white supremacist beliefs and ideologies is unacceptable and considered 'conduct unbecoming' of a sworn officer." The roll call training also included the department's policy obligating officers to report extremist behavior and explaining how to report it. It also included a reference document from the Center for Policing Equity titled "Law Enforcement and the White Supremacists Within." The roll call training did not contain information on extremist groups and symbols, which the PERF report recommended.

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<sup>26</sup> MPD, GO-PER-201.26, "Code of Conduct", updated on June 12, 2024, replaced GO-PER-201.26, Duties, Responsibilities and Conduct of Members of the Department, [https://go.mpdonline.com/GO/GO\\_201\\_26.pdf](https://go.mpdonline.com/GO/GO_201_26.pdf).

According to an MPD official, the draft policy has not moved toward implementation because the D.C. Police Union (the Union) pledged to challenge it as violating the First Amendment, and MPD is uncertain of how the courts would handle the challenge. On August 2, 2023, the Union wrote a letter addressed to MPD opposing the draft extremism policy. The Union’s letter claimed the policy violates the First Amendment rights of all employees, is unconstitutional because of its “overbreadth and vagueness,” and would be used to retaliate against members for their “personally held political views and religious beliefs.” The Union’s letter further alleges MPD created the policy to appease a “small minority of sensitive elements of our population that are manipulated by those seeking to exploit fabricated controversies.”

In an email to ODCA, an MPD official stated that publishing a policy on extremism would suggest to MPD members and the public that it is a “pressing issue,” and would negatively impact member morale. Both MPD and the Union indicated GO 201.26: “Duties, Responsibilities, and Conduct of Members of the Department” is already in place to hold members accountable for extremist activity.

According to Chief Smith, during her time as the Chief Equity Officer, she considered implementing some of PERF’s recommendations, but she believed MPD’s current policies were enough to send a message about what the department will and will not tolerate.

The GAO Green Book<sup>27</sup> recommends that management should remediate identified internal control deficiencies on a timely basis. Failing to remedy identified internal control deficiencies could lead to significant risks and consequences for the department. Specifically, by not implementing a policy that clearly identifies what behavior is not tolerated in the department, MPD risks treating white supremacy or other hate group behaviors like any other “conduct unbecoming” incident. A charge related to these behaviors could damage MPD’s credibility, eroding the trust needed for communities to have confidence in the police department to protect all persons. Not taking a strong and specific stance against members participating in activities that promote these ideologies could have the opposite effect MPD identified and cast doubt among the public about the officers’ willingness to protect them.

Further, MPD’s failure to implement the extremism GO meant that MPD lacked a specific category in PPMS for “extremism.” Identifying behaviors that may signify agreement with extremist views may be difficult for MPD to complete effectively and may result in MPD neglecting warning signs.

Figure 1 contains the other five PERF extremism framework recommendations and why MPD considers the recommendations to be addressed. ODCA confirmed the status provided by MPD.

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27 GAO, Standards for Internal Control in the Federal Government, GAO-14-704G, published September 10, 2014, p. 67.

Figure 1: PERF Extremism Framework Recommendations and Status

PERF Recommendation	Status
<p>Ensure the current screening process for new hires can adequately detect extremist behavior as outlined in the new policy.</p>	<p>Several of the application questionnaires probe these areas. Additionally, MPD asks for personal references as character witnesses and a psychological profile is conducted by the Medical Services Division.</p>
<p>Add a statement to the initial MPD application affirming the applicant has never belonged to an organization that advocates hate or discriminates against a group or groups.</p>	<p>The application questionnaire includes various questions such as:</p> <p>Are you now, or have you ever been, a <b>member or associate of a criminal enterprise, street gang, or any other group that advocates violence against individuals</b> because of their race, religion, political affiliation, ethnic origin, nationality, gender, sexual orientation, or disability? (emphasis added)</p> <p>Have you ever been <b>affiliated with any organizations, groups, gangs or persons who support or advocate any acts of violence or terrorism toward the United States government</b>, military, any U.S. businesses or citizens? (emphasis added)</p> <p>Are you now or have you ever <b>been a member of an organization designed to overthrow the United States Government by force</b> or violence or by other unlawful means? (emphasis added)</p>
<p>Provide specific training for background investigators.</p>	<p>Included in "Standard" forms in MPD personal history statement is: "Omitting information that should have been disclosed may be grounds for disqualification from any further consideration."</p> <p>The Anti-Defamation League (ADL) provided training to all MPD background investigators on 10/11/23.</p>
<p>Establish a formalized process for making and investigating complaints (both internal and external) related to extremism.</p>	<p>MPD's current misconduct investigation process is both formalized and able to investigate allegations of members involved in discriminatory or unbecoming conduct. Members can submit complaints, like the public, to Internal Affairs in a variety of different modalities. Members are protected against retaliatory filing of a complaint.</p>
<p>Commit to transparency regarding allegations and findings of extremism as part of a larger communications strategy of sharing wrongdoing and the agency's response to it.</p>	<p>MPD reports all sustained misconduct allegations resulting in Adverse Action on an annual basis on its website. To date, there have been no cases alleging hate group ties or sustained allegations of MPD members being tied to white supremacists or other hate groups.</p>

Source: MPD and ODCA follow-up

## Recommendations

3. MPD should follow PERF's recommendation and implement an extremism policy.
4. MPD should follow PERF's recommendation and educate the entire department on extremist symbols and groups.

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**MPD did not fulfill the D.C. Code requirement to ensure all sworn members completed annual training that included recognizing and preventing biased-based policing, racism, and white supremacy. In CY 2022, 53% of sworn members completed these training requirements and in CY 2023, 0.2% (6 sworn members) completed these training requirements.**

D.C. Code<sup>28</sup> requires sworn officers to receive 32 hours of continuing education each year, which should include, in part, instruction on "**recognizing and preventing** (emphasis added) biased-based policing, racism, and white supremacy."

In CY 2022, approximately 46.7% of sworn members did not fulfill the requirement to receive training that included recognizing and preventing biased-based policing, racism, and white supremacy.

In CY 2023, approximately 99.8% of sworn members did not fulfill the requirement to receive training that included recognizing and preventing biased-based policing, racism, and white supremacy. There were six sworn members in the Recruiting Division who participated in a one-time training on Understanding and Identifying Extremists provided by the Anti-Defamation League (ADL) and recommended by the PERF report.

In CY 2022 and 2023, MPD offered the following courses as an attempt to satisfy the requirement of training sworn members on recognizing and preventing biased-based policing, racism, and white supremacy.

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<sup>28</sup> D.C. Code § 107.02.

**Figure 2: MPD Courses and Objectives for CY 2022 and CY 2023**

MPD Course	Dates Offered	Objectives
Hate Crimes and Violent Extremism	May 3, 2021, through January 21, 2022 <sup>29</sup>	To understand ideologically extreme behaviors, evaluate the development of hate groups, and understand how ideologically extreme groups impact policing.
The History of Violent Crime and Race in DC	August 4, 2021, through December 1, 2022	To examine the concepts of structural and institutional racism, spatial policing, and trauma-informed policing.
Inclusive Policing	August 1, 2022, through May 4, 2023	To enhance members' ability to cultivate trust-based relationships with the communities they serve and discuss historical and contemporary barriers to trust and legitimacy.
Adolescent Racial Equity	January 18, 2023, through February 8, 2023	To reduce unnecessary and disproportionate police contact with youth of color, ensure each police interaction with a young person is racially equitable, and ensure officers treat every young person with dignity, humanity, and respect.

**Source: MPD and ODCA analysis of training materials.**

All four of the courses addressed biased-based policing and racism; however, ODCA determined that only the Hate Crimes and Violent Extremism course addressed *recognizing and preventing* white supremacy.

Between October 1, 2024, and October 31, 2024, MPD offered a roll call<sup>30</sup> training on recognizing and preventing white supremacy. The roll call training included a statement that employees are banned from “joining, supporting, or advocating for any hate group, paramilitary gang, or other criminal organization... [a]ny affiliation with or practice of racist or white supremacist beliefs and ideologies is unacceptable and considered ‘conduct unbecoming’ of a sworn officer.” This training, if properly documented, may satisfy the requirement for 2024 (which is outside of the scope of this audit), but it would not satisfy the requirement for either CY 2022 or CY 2023 given when it was offered.

Sworn members did not receive the required training because MPD chose to carry over training offerings from CY 2021 to CY 2022 due to disruptions including the COVID-19 pandemic and various First Amendment demonstrations that caused department-wide activations and led to training days being canceled or rescheduled in CY 2021. MPD called the CY 2022 training a “wash” because the CY 2021 training was still being taught. Like the year before, MPD chose to carry over CY 2022 training to CY 2023, and members received credit in CY 2023 for any course completed in CY 2022. Further, members were

<sup>29</sup> As discussed further below, some courses were primarily offered in CY 2021 because the Director of Continuing Studies stated MPD was allowing CY 2021 training to “carry over” to CY 2022 due to various First Amendment protests and Covid-19.

<sup>30</sup> MPD, GO-PER-404.06, “Roll Call Training,” effective July 31, 2002, defines roll call training as instruction or informational sessions administered to sworn members during their tour of duty roll call, see [https://go.mpdconline.com/GO/GO\\_404\\_06.pdf](https://go.mpdconline.com/GO/GO_404_06.pdf).

directed via teletype<sup>31</sup> that they did not need to retake the course.

In CY 2023, MPD did not offer a course on white supremacy to its members beyond a small number of background investigators that satisfied the requirement. According to one MPD official, the Inclusive Policing course covered radicalism and white supremacy. ODCA determined during its review of the course material, however, that the course included an understanding of the history of racism and policing institutions, but it did not address how to recognize or prevent white supremacy.

In CY 2022, some members may have had legitimate reasons why they may not have taken a course such as a suspension or being on extended medical leave. MPD, however, was unable to determine the actual reasons that each member did not take each relevant course because the human resource reports describing the members' statuses were only valid at the point in time of the creation of the report.

MPD was able to produce a list of members who had taken each training but was not able to utilize its learning management system to produce a list of active and inactive members who had not participated in the training. According to an MPD official in the Metropolitan Police Academy, MPD was unable to use the learning management system because, although the system tracks completion of the individual training course, it does not track who was actively employed in the time frame. The MPD official explained that the audit team would need to reconcile human resource rosters with the training completed data set and identify who was missing from the training lists.

Failing to meet the statutory continuing education requirement that includes recognizing and preventing biased-based policing, racism, and white supremacy potentially sends the message to the public that MPD is not taking the topic sufficiently seriously. Further, if MPD fails to ensure sworn members participate in training required by law, it risks having its members lack pertinent information and skills, losing an opportunity to reinforce existing knowledge, reducing the possibility that members remain up to date on the constantly evolving topic of recognizing white supremacist behaviors, and sensitizing members to white supremacy groups, symbols, and phrases. Finally, not being able to monitor easily who is not currently in compliance makes it more difficult for MPD to enforce the requirements of the law.

## Recommendations

5. MPD should ensure its annual training plan offers the required hours of continuing education and training, including recognizing and preventing biased-based policing, racism, and white supremacy.
6. MPD should update its tracking system to ensure it tracks and can produce reports of sworn members, active or inactive, who did not participate in training topics mandated by law.

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**MPD's post-hiring vetting of whether current members have ties to white supremacy or other hate groups is not consistent with best practices and thus leaves it vulnerable to overlooking behaviors that may indicate these affiliations.**

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<sup>31</sup> The Professional Development Training teletypes identify the training for members each calendar year.

MPD's policy<sup>32</sup> states the purpose of current employee background checks is to ensure the character and integrity of MPD employees. The policy states that IAB queries sworn employees annually (or when they are up for promotion) in the National Crime Information Center, Washington Area Criminal Intelligence Information Systems, Washington Area Law Enforcement System, Interstate Identification Index, and PPMS.

An MPD official stated that, aside from the hiring process, the department conducts no other proactive check-ins on whether current members are affiliated with white supremacist or other hate groups. Current members are checked annually through systems to determine whether they have been arrested, and quarterly for whether they have had contact with law enforcement, but MPD does not perform proactive social media checks. MPD does have an MPD member attached to an FBI task force focused on fraud and public corruption.

Chief Smith stated she believes MPD's current background check process on members is sufficient. Further, she indicated that screening current members, especially their social media, could be considered an invasion of privacy.

If MPD does not vet whether members have developed views aligned with white supremacist or other hate groups on an ongoing or periodic basis, members espousing such views may continue to perform their duties undetected and without consequences.

Other government entities including the federal Office of Personnel Management (OPM) recommend ongoing review.

A White House Executive Order<sup>33</sup> instructed OPM to "develop best practices for conducting background investigations and implementing properly validated selection procedures, including vetting mechanisms and ongoing employment screening, that, consistent with the First Amendment and all applicable laws, help avoid the hiring and retention of law enforcement officers who promote...white supremacy, or other bias against persons..."

OPM recommended<sup>34</sup> agencies use continuous vetting measures to promote timely detection of "behaviors of concern and potential threats and vulnerabilities, which may include identification of anti-government sentiment in law enforcement including white supremacist views or sympathies." Continuous vetting<sup>35</sup> is defined as a means of "reviewing the background of a covered individual at any time to determine whether the individual continues to meet applicable requirements." It ensures the individual's conduct throughout employment remains suitable for employment.<sup>36</sup>

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32 MPD, Special Order 10-16, effective November 1, 2012, see [https://go.mpdonline.com/GO/SO\\_10\\_16.pdf](https://go.mpdonline.com/GO/SO_10_16.pdf).

33 Executive Order 14074 of May 25, 2022. "Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety" Code of Federal Regulations, title 3 (2023):371-392.

34 U.S. Office of Personnel Management, "Action Plan for Strengthening Officer Recruitment, hiring, promotion, and Retention: Interagency Working Group Policies, Best Practices for Federal Law Enforcement Agencies," October 2023, <https://www.opm.gov/policy-data-oversight/hiring-information/reports/action-plan-for-strengthening-officer-recruitment-hiring-promotion-and-retention.pdf>.

35 Executive Order No. 13764, 3 C.F.R. page 6 (2017).

36 The federal government has continued to expand its "continuous vetting" in FY 2024, after the scope of this audit. In October 2024, the Defense Counterintelligence and Security Agency began offering a continuous vetting service to agencies for individuals in non-sensitive public trust positions. By FY 2027, it intends to offer continuous vetting for even low-risk populations.

By relying on pre-employment vetting alone, MPD risks not identifying sworn officers who later develop hate group ideologies or sympathetic behaviors.

Furthermore, a small number of respondents to ODCA's survey of MPD employees indicated that within the last six years, they knew or may have known sworn members who were members of white supremacist or other hate groups, had tattoos or wore clothing related to white supremacist or other hate groups, posted messages or pictures on social media related white supremacist or other hate groups, or displayed other activities that were related to white supremacist or other hate groups. When asked for an explanation, individual respondents offered these uncorroborated comments:

- "Definitely there are some sworn MPD members who are white supremacists. I mean we work together and we see how they behave when they are dealing with black people."
- "I have known two members that were part of the Radical Hebrew Israelites."
- "A Manager who is associated with the Proud Boys Hate Group."
- "Several members on the department have hate tattoos, such as "Spider Webbs [sic] on the elbow", and "Lightening Bolts", etc., which can have alternative non hate meanings; but should not be accepted as display while wearing an MPD uniform due to the negative meaning that could be perceived."
- "I say this as a [B]lack American- There are a significant number of individuals here who identify as Black Israelites or members of the Nation of Islam, organizations that the Anti-Defamation League and the Southern Poverty Law Center have classified as hate groups. These individuals frequently express their beliefs, including anti-Semitic and homophobic sentiments, and often racist or derogatory language when referring to our white, and on rarer occasions, Asian coworkers."

The survey was anonymous, so ODCA did not verify the veracity or accuracy of these statements and include them here to underscore the importance of the Department taking every legal step available to ensure sworn members continuously remain suitable for their positions.

## Recommendation

7. MPD should develop policies and procedures to vet sworn members for affiliation with white supremacy or other hate groups on a periodic or ongoing basis.

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**ODCA identified 24 relevant, sustained reports of incidents in a 5-year period, 2 involving the Proud Boys group, and 22 involving bias or discrimination, usually the use of racially charged language.**

As noted, MPD's Internal Affairs Division maintains a comprehensive database for complaints against members of the staff and discipline that results from complaints. MPD provided ODCA with 21,233 unique

incident reports containing 43,878 allegations<sup>37</sup> against sworn officers between October 1, 2018, and December 31, 2023.<sup>38</sup> Of these unique incidents, 6,678 (containing 10,585 allegations) were sustained. A majority of the incidents were reported within the department while roughly 30%<sup>39</sup> came from District residents or others outside the department [See Appendix A for a more detailed methodology].

Between October 1, 2018, and December 31, 2023, MPD recorded allegations in 159 categories including “bias/discrimination,”<sup>40</sup> “OPC-discriminatory treatment” and “conduct unbecoming.” There were no categories for allegations of “extremism” or “affiliation with hate groups.” Using keyword searches and the MPD categories we identified sustained incidents that could indicate sympathy with views associated with hate groups.

To ensure that other complaints involving bias/discrimination were not classified under a different category, ODCA conducted additional investigation into the other sustained complaints. First, ODCA determined what complaints may be relevant by narrowing the incidents to those involving 55 allegation categories that the audit team thought could possibly be relevant to the audit’s objectives.<sup>41</sup> For this exercise, ODCA erred on the side of inclusion. There were 5,309 unique sustained incidents containing allegations in those 55 allegation categories.

ODCA reviewed the synopses for those 5,309 incidents using the methodology described in Appendix A. That preliminary review yielded 56 incidents that ODCA selected and conducted a deeper inquiry into the underlying documents included in PPMS. That inquiry identified two incidents involving two sworn members that involved the extremist group, the Proud Boys<sup>42</sup>, and 22 unique incidents involving sworn members with some element of discriminatory/biased behavior. The incidents included:

- 17 incidents involving derogatory or biased remarks toward another MPD officer or member of the public.
- 5 incidents involving derogatory or biased social media posts.

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## **MPD imposed discipline against 22 out of the 26 sworn members involved in sustained incidents between October 1, 2018, and December 31, 2023, that involved bias or discrimination. Records on the remaining incidents documented why discipline was not imposed.**

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37 Each incident can involve one or multiple officers and one or multiple allegations within the incident (e.g., it may involve a “conduct unbecoming” allegation and a “body-worn camera” allegation for the same incident).

38 MPD provided ODCA with 21,719 unique incidents containing 44,632 allegations, but those incidents and allegations included a small number against civilians or cadets, which ODCA removed.

39 Of the 43,878 allegations, 30,942 were internal allegations reported through MPD’s Internal Affairs Division, 12,913 were external allegations reported through the Office of Police Complaints and 23 allegations did not include a classification in the data provided.

40 In the total population of unique incidents, there are only three unique sustained incidents containing allegations categorized as bias/discrimination within our scope period as of January 2024.

41 ODCA excluded incidents that solely involved allegation categories classified as various “Use(s) of Force” because the synopses for these incidents focused exclusively on the physical use of force rather than the underlying reason for the use of force. This filtered out 15,903 allegations in 6,154 unique incidents.

42 The Proud Boys have been identified at various times as an extremist group by both the ADL (see <https://www.adl.org/resources/backgrounder/proud-boys>) and the Southern Poverty Law Center (see <https://www.splcenter.org/resources/extremist-files/proud-boys/>).

MPD's GO<sup>43</sup> entitled "Sworn Employee Discipline" states that disciplinary action shall be administered by the department for sustained misconduct in a manner, and at a level, appropriate with the member's past record and the seriousness of the offense, giving due consideration to mitigating and aggravating factors. The department issues two types of disciplinary action: corrective action and adverse action.<sup>44</sup> When determining the appropriate level of disciplinary action, the department uses a table of penalties as a guide to ensure fairness and consistency.

We reviewed the disciplinary action taken against the 26 officers who had a sustained complaint against them for incidents between October 1, 2018, and December 31, 2023, involving activities associated with the Proud Boys or involving bias or discrimination. In total, 22 members received discipline ranging from a corrective action dereliction report to demotion in rank for these incidents.

The remaining members included four who did not receive discipline for the reviewed incidents because:

- One member retired in advance of discipline.
- One member resigned before final discipline.
- One member entered into an arbitration agreement.
- One member's investigation was conducted by the member's chain of command. Because corrective action was recommended for the member by the chain of command, DRD did not take further disciplinary action.

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### **MPD's early behavior identification system does not include certain allegation categories and is not assigning required points for relevant complaints, which could result in members avoiding early interventions.**

MPD policy<sup>45</sup> requires supervisors to conduct a Supervisory Support Program (SSP) assessment when a member reaches a 100-point threshold or if the SSP coordinator is notified by the member's supervisor that an SSP assessment will be conducted.

The SSP is MPD's early identification system for identifying and supporting sworn and civilian employees and Reserve Corps members who may be experiencing issues affecting their job performance. Members are supposed to accrue "points" automatically when an incident that has associated SSP indicators is entered into PPMS. The number of points that the member should be assigned is outlined in a chart in GO 120.28. Several categories that are relevant to this audit are included as incident types that accrue SSP points.

The GO's SSP Indicator Chart does not specify the number of points members should accrue for sustained OPC allegations. In Figure 3 below, the OPC allegations are marked "not specified" if the category in the

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43 MPD GO-PER-120.21, "Sworn Employee Discipline" effective November 27, 2022, [https://go.mpdconline.com/GO/GO\\_120\\_21.pdf](https://go.mpdconline.com/GO/GO_120_21.pdf).

44 Ibid, defines corrective action as unit-level discipline that ranges from a dereliction report to official reprimand, and adverse action as department-level discipline that may involve a fine, suspension, reduction in rank or pay, or termination.

45 MPD GO-120.28, "Personnel Performance Management System (PPMS) and the Supervisory Support Program (SSP)," effective February 1, 2019, [https://go.mpdconline.com/GO/GO\\_120\\_28.pdf](https://go.mpdconline.com/GO/GO_120_28.pdf).

SSP system did not have an equivalent allegation category included in the GO indicator chart.

One of the 35 allegations<sup>46</sup> that ODCA determined involved bias or discrimination or an association with an extremist group was not assigned the correct points in the SSP system. The SSP system assigned fewer points than what is outlined in the GO for incidents labeled “OPC Harassment,” “OPC Demeaning Language,” “OPC Discriminatory Treatment,” and “OPC Unnecessary Force.” Figure 3 below displays the number of points that GO 120.28 indicates a member should be assigned for certain offenses compared to the number of points MPD reported were assigned in the SSP system.

**Figure 3: OPC Sustained Allegations SSP System Indicator Points Compared to GO 120.28**

Member-Level Dispositions	System Points	GO Points (Not OPC Specific)
OPC – Excessive Force--OPC Sustained	100	100
OPC – Harassment--OPC Sustained	25	50
OPC – Violation--OPC Sustained	25	Not specified
OPC – 45 Day Referrals--OPC Sustained	25	Not specified
OPC – Conduct--OPC Sustained	25	Not specified
OPC – Demeaning Language--OPC Sustained	25	50
OPC – Discriminatory Treatment—OPC Sustained	25	100
OPC – Fail to Cooperate—OPC Sustained	25	Not specified
OPC – Failure to Answer Questions—OPC Sustained	25	Not specified
OPC – Failure to Provide ID—OPC Sustained	25	Not specified
OPC – FTA - Fail to Appear—OPC Sustained	15	Not specified
OPC – FTC - Failure to Sign Statements—OPC Sustained	25	Not specified
OPC – Jurisdiction Referral—OPC Sustained	25	Not specified
OPC – Unnecessary Force—OPC Sustained	25	100 <sup>47</sup>
OPC – FTA - Mediation Preparation—OPC Sustained	25	Not specified
OPC – Retaliation - Sustained—Sustained	15	Not specified

**Source: MPD and GO 120.28**

<sup>46</sup> ODCA conducted a review of sustained complaints and determined that 24 sustained unique incidents involved hate groups, bias, discrimination, or prejudice. Those 24 sustained unique incidents contained a total of 35 sustained allegations because each complaint could contain multiple allegations.

<sup>47</sup> According an MPD Official, “Unnecessary Force” is equivalent to Excessive Force and is assigned 100 points.

MPD officials were unable to determine why OPC allegations were not in the GO. MPD officials speculated that the points in the GO and SSP system may differ because the IAD misconduct categories may have been updated in the system by someone who was unaware there were categories labeled “OPC” that also needed to be updated. The same MPD personnel speculated that the OPC allegations may have been simply entered incorrectly, or that IAD may not have asked to update the system when the GO was updated.

Because the GO’s SSP Indicator Chart does not specify OPC allegations, it does not clearly define how OPC allegations should appear in the SSP system and has created a disconnect between OPC allegations and IAD misconduct allegations.

Because of the system’s assigned indicator points not aligning with the GO, the SSP has not always identified members who may be experiencing issues affecting their job performance when those issues involve OPC incidents.

## **Recommendations**

8. MPD should update GO 120.28’s SSP Indicator Chart, to include OPC allegation categories.
9. MPD should update the SSP system’s indicator points for OPC sustained allegations to match the GO’s SSP Indicator Chart.

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## **MPD did not obtain documentation verifying members’ completion of early behavior intervention plans making it difficult to confirm that members completed interventions.**

The Green Book<sup>48</sup> states that management should design control activities to achieve objectives and respond to risks. Management designs appropriate types of control activities for the entity’s internal control system. Control activities help management fulfill responsibilities and address identified risk responses in the internal control system. A common control activity is clearly documenting significant events that allows the documentation to be readily available for examination.

GO 120.28, PPMS and SSP,<sup>49</sup> states that managers are responsible for preparing intervention plans. Successful completion of the plan is not mandatory, but the member’s receptiveness to the feedback must be documented. The GO further states, if a member is referred to training or the Metropolitan Police Employee Assistance Program (MPEAP), a counseling program for police officers and their families, the supervisor must document in the SSP case folder the date the member was notified of the intervention plan and the date the member completed the training or MPEAP sessions.

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48 GAO, Standards for Internal Control in the Federal Government, GAO-14-704G, published September 10, 2014, p. 45.

49 MPD, GO-120.28, “Personnel Performance Management System (PPMS) and the Supervisory Support Program (SSP),” effective February 1, 2019, [https://go.mpdconline.com/GO/GO\\_120\\_28.pdf](https://go.mpdconline.com/GO/GO_120_28.pdf).

The 24 sustained unique incidents that ODCA determined were relevant to the audit topic contained allegations against 26 sworn members. Five of those sworn officers reached the SSP threshold and received an SSP Assessment and Intervention Plan. The interventions imposed included oral counseling, reviewing general orders, training, and attending MPEAP sessions.<sup>50</sup> MPD could not provide documentation showing completion of the training or MPEAP sessions required for the SSP intervention plans.

GO 120.28 does not specify that documentation should be retained for completed intervention plans. The policy requires the date the member completed the training or MPEAP appointment to be documented in the SSP case folder. An MPD member stated that, when members subject to an SSP Intervention and Assessment Plan complete training, they notify their manager, and the manager marks it as complete. The member interviewed was unsure if the managers received documentation indicating that the member completed the training and stated documentation could be part of the member's personnel file, but it is not in the SSP file.

MPD explained that the process for communicating MPEAP session completion has changed over the years. According to MPD, the MPEAP sessions would only be marked as "complete" if MPEAP notified MPD that the member had completed the session.

Failing to obtain training documentation or MPEAP attendance in a central location hinders MPD's ability to verify that a member completed the intervention plan. The audit team did not find evidence in the cases we reviewed that a member did or did not complete a required training or MPEAP session. That said, the lack of document retention could result in members who do not complete one going undetected.

## Recommendation

10. MPD should develop policies and procedures for documenting completed training and MPEAP sessions that include where the documentation should be retained and for how long.

## Survey Discussion

Between September 18, 2024, and October 2, 2024, ODCA administered a survey of MPD employees. The survey was sent to 3,859 current members<sup>51</sup> and included both sworn and non-sworn employees. Despite the Union and an individual official sending messages to discourage members from completing the survey, ODCA received 307 responses.<sup>52</sup>

The survey covered the following six general topics:

- Whether members have experienced or witnessed colleagues being involved or affiliated with white supremacist or other hate groups.

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<sup>50</sup> Managers can also recommend that members receive no intervention depending on the circumstances of the case.

<sup>51</sup> Six emails went undelivered in the process and 3,859 were delivered.

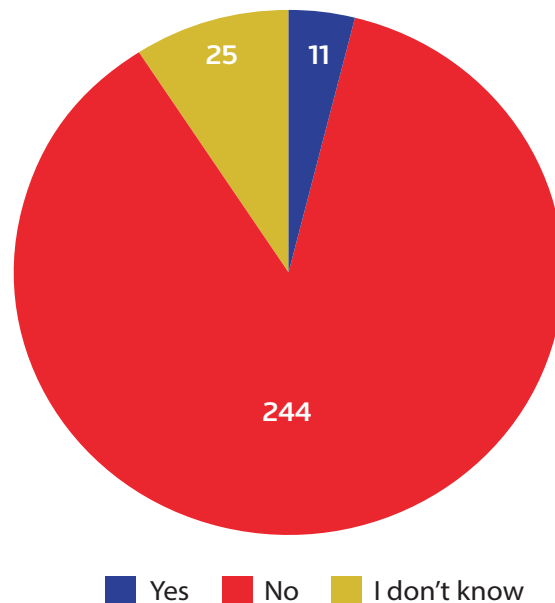
<sup>52</sup> The team removed responses that were labeled "Decline to answer" from the percentage calculations.

- Whether members have experienced or witnessed biased or discriminatory behavior within MPD.
- Whether members knew about and could identify activities, behaviors, and symbols that may indicate affiliation with white supremacy or other hate groups.
- Whether members knew MPD’s policies related to activities and social media posts related to white supremacist or other hate groups.
- Whether members believed MPD leadership at varying levels have conveyed messages surrounding the acceptance or prohibition of behaviors related to white supremacist or other hate groups.
- Whether members have used MPD’s reporting process to report behaviors related to white supremacy and other hate groups and their opinions about that process.

The following are general takeaways from that survey and the full results are included in Appendix B.

Of members who answered the question, 87% (n=244) of respondents reported they had not witnessed sworn members displaying behaviors or engaging in activities they associated with white supremacy or other hate groups in the past six years (See Figure 4). Four percent (n=11) of respondents, however, reported they had witnessed these behaviors, noting a range of explanations, including political affiliations and memberships in organizations that, although not explicitly classified as hate groups, raised concerns. Responses also referenced issues related to interpersonal communication and the use of language that the respondent found inappropriate.

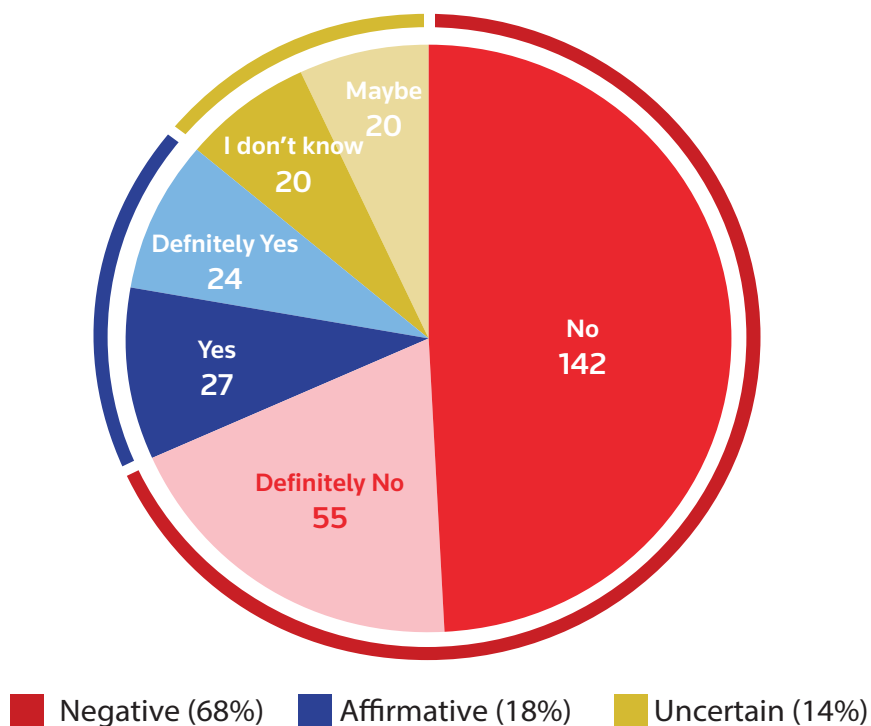
**Figure 4: MPD Member Responses to Question: “Within the last six (6) years, have you personally seen MPD sworn members participate in activities or display behaviors aligned with white supremacy or other hate groups?”**



Source: ODCA analysis of survey results.

A higher proportion of respondents reported knowing MPD officers who engaged in biased behavior<sup>53</sup> (51 out of 288 or 18%) (See Figure 5) or being a victim of racism or racist remarks by MPD members (29 out of 286 or 10%) (See Figure 6).

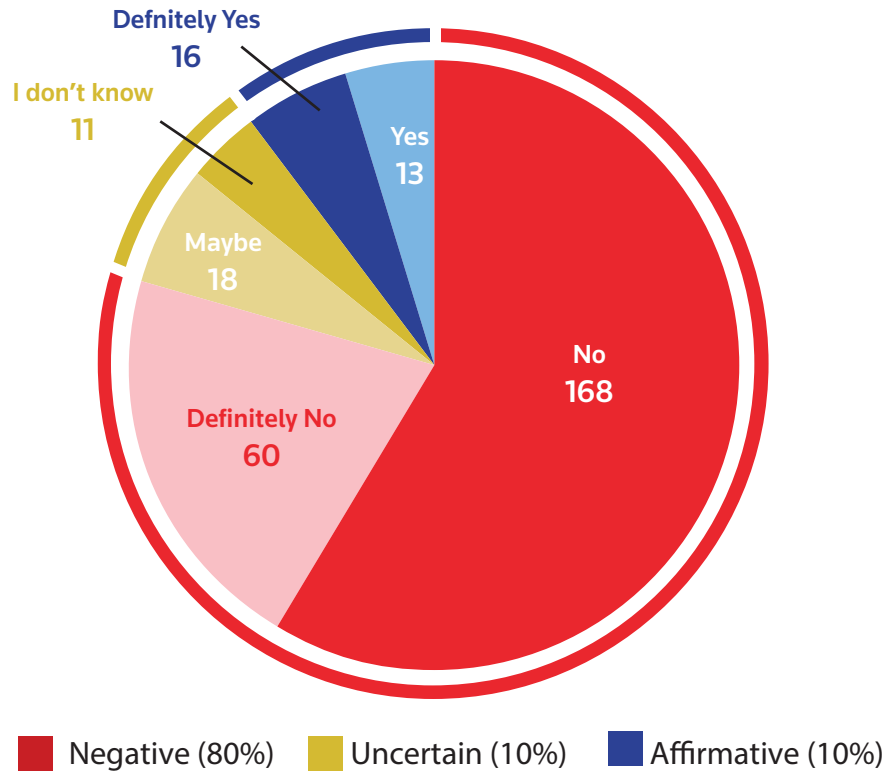
**Figure 5: MPD Member Responses to Question “Do you know any sworn MPD officers who, as defined in the General Order on Code of Conduct, have singled out or treated a person differently on the sole basis of race, color, religion, national origin...?”**



Source: ODCA analysis of survey results.

<sup>53</sup> Defined as singling out or treating someone differently based on race, color, religion, or national origin.

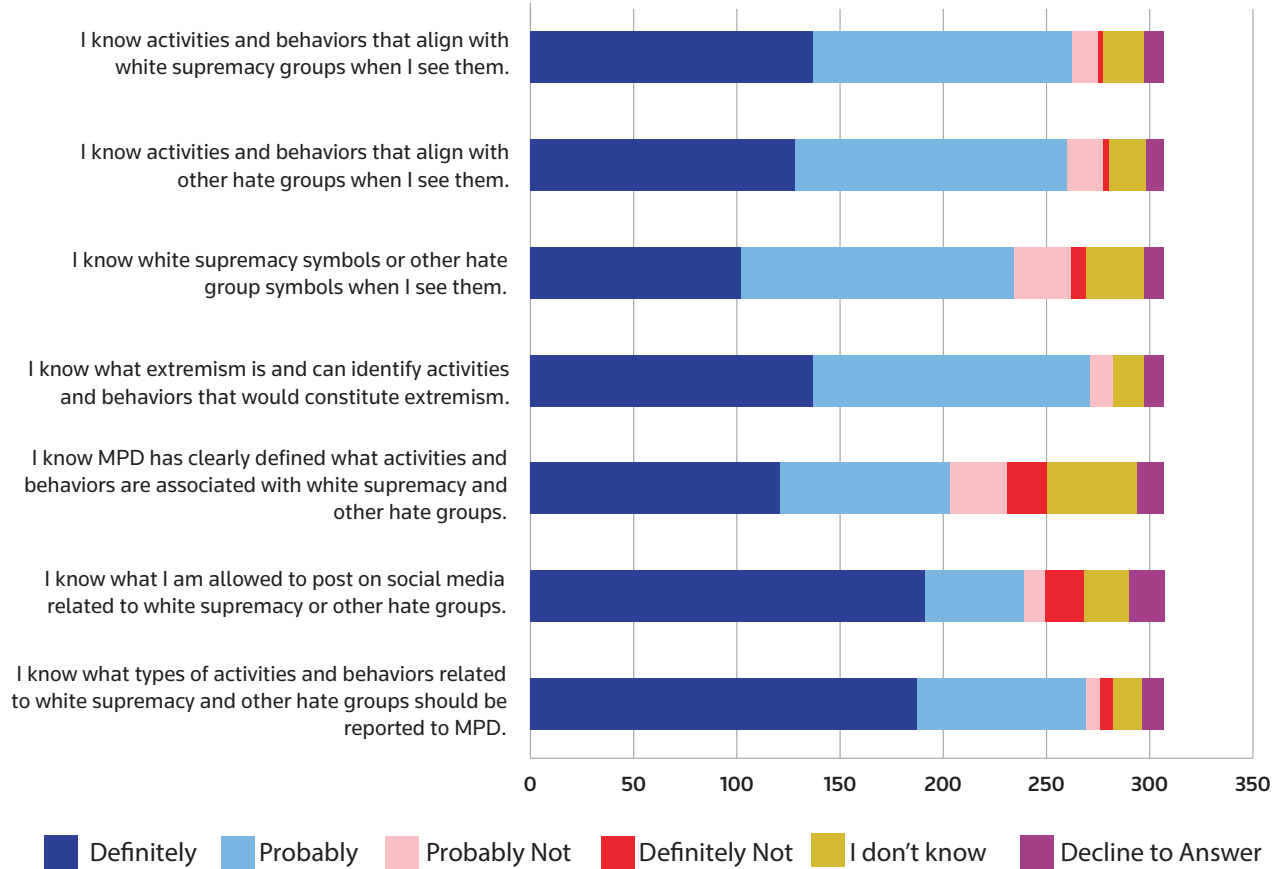
Figure 6: MPD Member Responses to Statement “In the last six (6) years, I have been a victim of racism or racist remarks from an MPD member.”



Source: ODCA analysis of survey results.

Most respondents reported that they at least “probably knew” what extremism is and what behaviors would constitute extremism (91%, n=271), what behaviors align with white supremacy (88%, n=262) and other hate groups (87%, n=260), and what types of behaviors should be reported to MPD (91%, n=269). To a slightly lesser extent, respondents indicated they at least “probably knew” how MPD defines white supremacy (69%, n=203), how to recognize white supremacy or other hate group symbols (79%, n=234), and what they are allowed to post on social media related to white supremacy or other hate groups (82%, n=239). (See Figure 7).

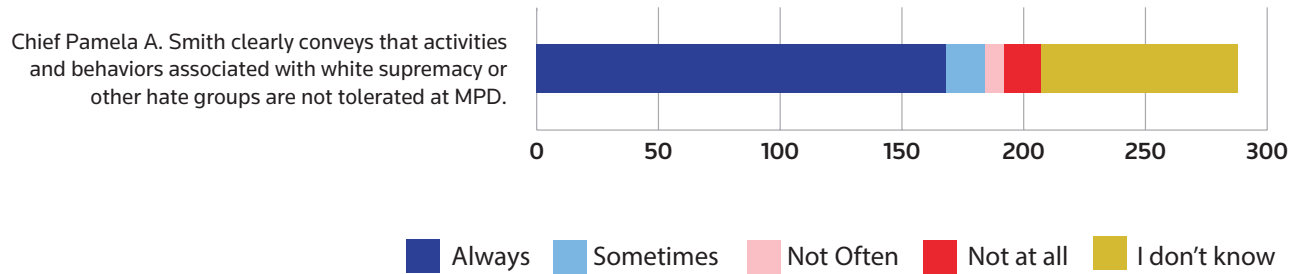
**Figure 7: MPD Member Responses to Survey Questions 1–7**



Source: ODCA analysis of survey results.

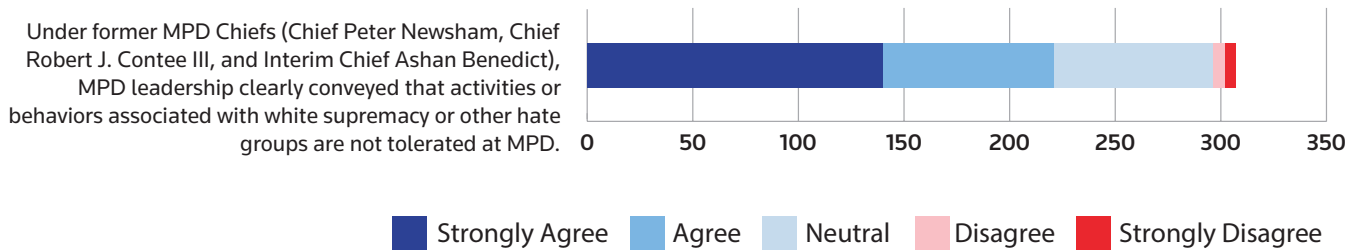
A majority of survey respondents reported that Chief Smith had actively conveyed that activities and behaviors associated with white supremacy and hate groups are not tolerated, with 64% (n=184) of respondents indicating that Chief Smith always or sometimes conveyed a clear message and 8% (n=23) of respondents saying she conveyed the message “not often” or “not at all.” (28% (n=81) of respondents said they “didn’t know”) (See Figure 8). Former Chief Peter Newsham, former Chief Contee, and former Interim Chief Ashan Benedict scored slightly better on a similar question with 72% (n=221) of respondents saying they “agreed” or “strongly agreed” that the former chiefs conveyed a message that activities or behaviors associated with white supremacy or other hate groups are not tolerated, while 4% (n=11) of respondents “disagreed” or “strongly disagreed” with the question (an additional 24% (n=75) of respondents said they were “neutral”). (See Figure 9).

**Figure 8: Tolerance of White Supremacist and Other Hate Group Activities and Behavior at MPD by Chief Smith as Perceived by Respondents at MPD**



Source: ODCA analysis of survey results

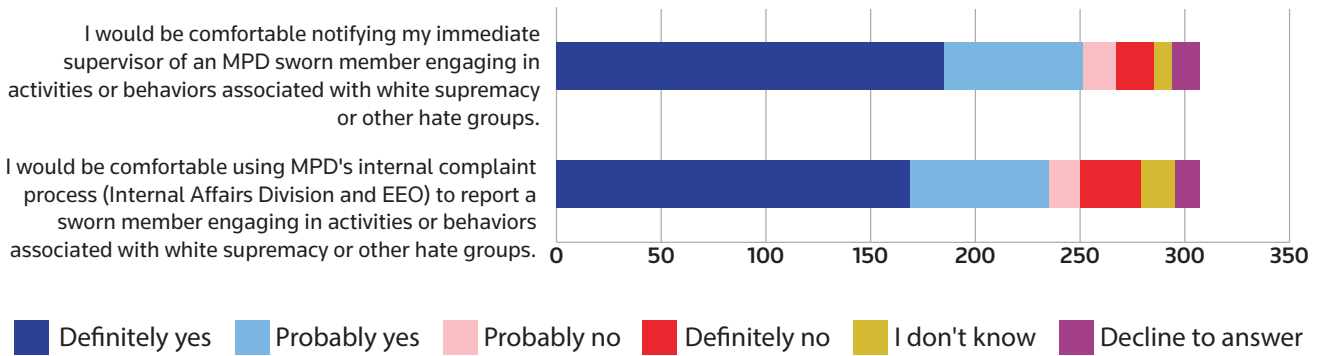
**Figure 9: Demonstrated Tolerance of White Supremacist and Other Hate Groups by Police Chiefs as Perceived by Respondents at MPD**



Source: ODCA analysis of survey results

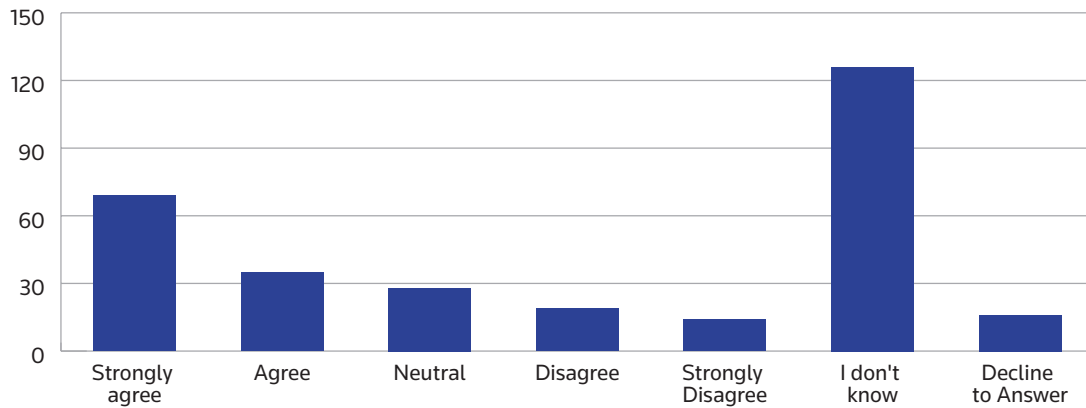
A majority of respondents (85%, n=251) expressed comfort with notifying a supervisor directly and using the internal complaint process (80%, n=235). (See Figure 10). Despite respondents largely seeming comfortable using the complaint reporting process if they were to encounter officers associating with white supremacy or hate groups, less than half of the respondents agreed or strongly agreed that MPD’s response to those complaints was fair and impartial (36%, n=104), while 43% (n= 126) of respondents indicated that they did not know to the same question. (see Figure 11). One possible explanation for this discrepancy is that not all of the survey respondents may have gone through the complaint process.

**Figure 10: Comfort Level of MPD Members in Using Internal Complaint Process Versus Notifying Immediate Supervisor**



Source: ODCA analysis of survey results.

**Figure 11: MPD Members Responses to Statement "Complaints for sworn members engaging in activities or behaviors associated with white supremacy or other hate groups is impartial and fair."**



Source: ODCA analysis of survey results

Finally, none of the 10 respondents who indicated that they have reported a sworn member engaging in activities or behaviors that they knew were associated with white supremacy or other hate groups were satisfied with the outcome of the complaint, and only two were somewhat satisfied with the outcome. Of the 29 respondents who indicated they have reported an officer engaging in activities or behaviors that they knew were biased, only nine were somewhat satisfied, satisfied or definitely satisfied with the outcome of their complaint. (see Figure 12).

**Figure 12: Satisfaction with Outcome of Reported Biased or Hate Group Behaviors/Activities**

Report Basis	Definitely satisfied	Satisfied	Somewhat satisfied	Not satisfied	I don't know	Decline to answer
Reported Biased Behaviors	3	4	2	17	1	2
Reported White Supremacy and Hate Group Behaviors	0	0	2	7	1	0

Source: ODCA analysis of survey results

# Conclusion

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During this audit, ODCA sought to answer three primary questions with regard to MPD processes related to white supremacy and other hate groups:

1. How the department prevents the recruiting and hiring of officers with ties to hate groups.
2. How it ensures current members do not develop ties to hate groups.
3. How it responds to incidents that may indicate a sympathy toward views espoused by hate groups.

During its examination of these three questions, **ODCA found no evidence of MPD hiring an applicant with ties to white supremacy or other hate groups or linking current sworn members of MPD to white supremacy or other hate groups apart from previously publicized association with the Proud Boys by two sworn members.**

This lack of indications of affiliations is likely attributable to the many screening steps MPD has taken in its application and onboarding process. MPD has checks set up throughout its process that are designed to identify applicants with ideologies or sympathies toward white supremacy, extremism, and other hate groups.

While commending these current efforts, ODCA notes that there is an opportunity for MPD to enhance its internal controls in the hiring process. Specifically, MPD should improve its verification of applicants' tattoos and update its social media screening keyword list to detect and mitigate potential biases or affiliations with white supremacy or other hate groups more effectively.

There are steps that MPD can take to strengthen its efforts to prevent these hate group ideologies from developing among current members as well. Attitudes and beliefs can develop over time, and MPD's policies and processes should reflect that reality. Consequently, it should continue to work toward identifying and preventing any development of these beliefs among its members.

Additionally, the department should ensure it provides annual continuing education on topics related to recognizing and preventing white supremacy or other hate groups, keeping its members informed on emerging trends and reinforcing what they already know. Strengthening these internal controls for current members will help prevent behaviors that could harm the department's integrity and reputation.

MPD has responded to all sustained incidents that ODCA identified as being related to the audit topic, as is evidenced by the discipline it imposed for each of the incidents (or valid reason discipline was not yet imposed). That said, MPD has an opportunity to adjust a few aspects of its early identification process that will help it adopt a more proactive approach to addressing any of these concerns. By ensuring that points are assigned for all incidents and taking steps to ensure that members who are identified fulfill the recommendations of their SSP assessment, MPD can take additional proactive steps toward preventing problematic behaviors before they arise.

By making a few changes to its processes and adopting an even more proactive strategy towards identifying, preventing, and responding to ties or affiliations with white supremacy or other hate groups, MPD could reinforce its stated commitment to unbiased treatment and further strengthen public trust in the department and its officers.

# Summary of Report Recommendations

Our audit identified 10 recommendations that could improve operations at MPD.

Findings	Recommendations
MPD complied with extensive current requirements for screening applicants but did not incorporate additional best practices for screening applicants' tattoos for affiliations with white supremacy or other hate groups.	<b>1.</b> MPD should develop policies and procedures to verify applicants' self-reported tattoos as part of the screening process.
MPD did not update the keyword list for its pre-hiring social media screening tool, resulting in an increased risk of overlooking relevant insight into sworn applicants' suitability.	<b>2.</b> MPD should develop a policy that ensures an MPD staff member(s) reviews the behavior kit keyword list and include in that policy the frequency of when to update the list to ensure current words and phrases related to white supremacy and other hate groups are listed.
MPD did not implement two recommendations made by the Police Executive Research Forum: implement a policy on extremism and use an educational campaign on extremist groups and symbols. This hindered MPD's ability to educate the department on extremism and track incidents related to extremism.	<b>3.</b> MPD should follow PERF's recommendation and implement an extremism policy. <b>4.</b> MPD should follow PERF's recommendation and educate the entire department on extremist symbols and groups.
MPD did not fulfill the D.C. Code requirement to ensure all sworn members completed annual training that included recognizing and preventing biased-based policing, racism, and white supremacy. In CY 2022, 53% of sworn members completed these training requirements and in CY 2023, 0.2% (6 sworn members) completed these training requirements.	<b>5.</b> MPD should ensure its annual training plan offers the required hours of continuing education and training, including recognizing and preventing biased-based policing, racism, and white supremacy. <b>6.</b> MPD should update its tracking system to ensure it tracks and can produce reports of sworn members, active or inactive, who did not participate in training topics mandated by law.
MPD's post-hiring vetting of whether current members have ties to white supremacy or other hate groups is not consistent with best practices and thus leaves it vulnerable to overlooking behaviors that may indicate these affiliations.	<b>7.</b> MPD should develop policies and procedures to vet sworn members for affiliation with white supremacy or other hate groups on a periodic or ongoing basis.

Findings	Recommendations
<p>ODCA identified 24 relevant, sustained reports of incidents in a 5-year period, 2 involving the Proud Boys group, and 22 involving bias or discrimination, usually the use of racially charged language.</p>	<p>There are no recommendations for this finding.</p>
<p>MPD imposed discipline against 22 out of the 26 sworn members involved in sustained incidents between October 1, 2018, and December 31, 2023, that involved bias or discrimination. Records on the remaining incidents documented why discipline was not imposed.</p>	<p>There are no recommendations for this finding.</p>
<p>MPD’s early behavior identification system does not include certain allegation categories and is not assigning required points for relevant complaints, which could result in members avoiding early interventions.</p>	<p><b>8.</b> MPD should update GO 120.28’s SSP Indicator Chart, to include OPC allegation categories.  <b>9.</b> MPD should update the SSP system’s indicator points for OPC sustained allegations to match the GO’s SSP Indicator Chart.</p>
<p>MPD did not obtain documentation verifying members’ completion of early behavior intervention plans making it difficult to confirm that members completed interventions.</p>	<p><b>10.</b> MPD should develop policies and procedures for documenting completed training and MPEAP sessions that include where the documentation should be retained and for how long.</p>

# Agency Comments

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On February 5, 2025, we sent a draft copy of this report to the Metropolitan Police Department (MPD) for review and written comment. MPD responded with comments on February 19, 2025. Agency comments are included here in their entirety, followed by ODCA's response.



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
METROPOLITAN POLICE DEPARTMENT

February 19, 2025

Kathleen Patterson  
D.C. Auditor  
Office of the District of Columbia Auditor  
1331 Pennsylvania Avenue, NW, Suite 800 South  
Washington, DC 20004

Dear Ms. Patterson,

Thank you for providing the Metropolitan Police Department (MPD) with an opportunity to review the Office of the District of Columbia Auditor's (ODCA) draft report titled *MPD Curbs Influence from White Supremacy, Other Hate Groups*. MPD appreciates the diligent effort by you and your team in conducting this study. Thank you for being a partner in our public safety mission of providing the best service to our community.

MPD has strong policies, training, and accountability systems in place to ensure that our members exercise their authority in a fair, impartial, and constitutional manner. We also work hard to ensure our workplace is an inclusive one; however, an inclusive workplace does not mean we will tolerate activities related to extremism, hate, or discrimination among our members. Please see the Department's response to the specific recommendations below.

### **MPD Responses**

#### **1. MPD should develop policies and procedures to verify applicants' self-reported tattoos and determine the significance of tattoos.**

As noted in the report, MPD conducts extensive social media and psychological screenings for sworn officer applicants, and both processes are administered by outside entities to ensure objectivity. Further, MPD's policy related to personal grooming standards for current members (General Order 110.11, Section 2.A.8) contains limitations on tattoos:

*Tattoos shall be covered when in uniform whenever possible. Tattoos that cannot be covered shall not contain language or characterizations that are derogatory or offensive to any social, economic, or ethnic group.*

This policy is narrowly tailored to specifically address visible tattoos, which balances two important interests: the privacy of our members and the public perception of MPD's ability to police in an impartial manner.

These interests are also balanced in MPD's practice of having applicants self-identify their tattoos and provide their meaning. The meanings of some tattoos may be subjective, so it is important to get an account from the applicant themselves rather than leave an interpretation up to the background investigator. Furthermore, societal meanings ascribed to certain tattoos can

also change over time, so a member may have gotten a tattoo before it became associated with a problematic movement or group. The self-identification process allows them to explain that circumstance.

One additional note: As a civilian law enforcement organization, the standards and expectations of our members and their rights to First Amendment expression are different from those that may be applied to members of the US military.

- 2. MPD should develop a policy that ensures an MPD staff member(s) reviews the behavior kit keyword list and include in that policy the frequency of when to update the list to ensure current words and phrases related to white supremacy and other hate groups are listed.**

MPD agrees that the scheduled review of the behavior kit keyword list is an important step in ensuring that our recruiting standards remain current. Recruiting Division will establish an internal procedure to periodically review the current words and phrases used by the vendor and ensure the list is updated as needed.

- 3. MPD should follow PERF's recommendation and implement an extremism policy.**

As MPD shared with the Auditor previously and noted in the Auditor's report, if MPD were to move forward with a standalone extremism policy, the Union has pledged to challenge it as violating the First Amendment. While we tailored the draft policy as narrowly as possible to address the prohibited conduct, we do not have the benefit of a model policy that has successfully withstood Constitutional scrutiny and cannot predict how or when such a challenge might ultimately be resolved. In addition to the uncertainty of how a court would view this challenge, there are other considerations, both internally and externally, that weigh against moving forward.

Publishing such a policy suggests – without evidence – to both our members and the public that extremism is a pressing issue within the Department. Such a message would negatively impact officer morale at a critical time when we are asking our officers to do more and more. Not only would the officers potentially interpret this action in this way, but the union and media would almost certainly reinforce that unintended message, resulting in the public's perception of MPD also being negatively impacted.

MPD's current policies give members guidance as to what behaviors are and are not acceptable, and they also provide the agency with the tools needed to address extremism within our ranks. Our Social Media Policy was developed in 2022 and incorporates industry best practices, and we revised our EEO Policy in 2023 and updated it again in 2024. The EEO policy updates also were accompanied by departmentwide training and an organizational restructure. The most critical policy for holding members accountable in this area is our Code of Conduct (General Order 201.26), which addresses "Unbecoming Conduct":

*Members shall conduct their private and professional lives in such a manner as to avoid bringing discredit upon themselves, MPD, or the District of Columbia. Members shall*

*maintain a level of conduct in their personal and business affairs which is consistent with the highest standards of the law enforcement profession.*

This language gives MPD the ability to hold members accountable for participation in extremist activity in the same way a standalone extremism policy would (like the one recommended by PERF), and it has the added benefit of already being in place and accepted by the Union. If an investigation uncovers actual extremism-related conduct, we already possess the authority necessary to take appropriate action without generating any of the negative externalities that may accompany publication of a new policy.

**4. MPD should follow PERF’s recommendation and educate the entire department on extremist symbols and groups.**

MPD’s recruit and in-service training includes several courses on different cultures as well as ways to identify and counter racism and extremism. For example, our recruit officers visit the National Museum for African American History and Cultures as well as the Holocaust Museum. They also receive training from our Special Liaison Branch, which leads outreach for our historically marginalized communities.

In addition, all members receive regular training in the following areas: Hate Crimes and Violent Extremism; History of Race and Violence crime in Washington, DC; Inclusive Policing; Adolescent Racial Equity and Policing in DC; EEO and Sexual Harassment; Hate/Bias Crimes. All members also receive training in Active Bystandership, which increases accountability by equipping them with the tools to call out behavior among their peers that is not acceptable.

Several of MPD’s courses are developed in partnership and/or taught by outside partners, including the University of the District of Columbia (UDC), Georgetown University, and the Anti-Defamation League (ADL).

MPD’s 2025 Professional Development Training, which all sworn members must complete, will include training on extremism symbols and groups.

**5. MPD should ensure its annual training plan offers the required hours of continuing education and training, including recognizing and preventing biased-based policing, racism, and white supremacy.**

MPD creates an annual training plan to ensure all required topics are covered. In 2025, MPD will provide mandatory training in the following areas, including two hours specifically devoted to “White Supremacy, Implicit Bias, and Impartial Policing”:

In-Person Training Days:

- Active Bystandership for Law Enforcement (ABLE), Tactical Emergency Causality Care (TECC), Cardiopulmonary Resuscitation (CPR), ASP Baton and OC Spray (8 hours)
- Tactical Training Center (8 hours)

### Learning Management System Module Training:

- 4th Amendment Refresher (2 Hours)
- Community Policing (2 Hours)
- **White Supremacy, Implicit Bias and Impartial Policing (2 Hours)**
- Interacting with individuals with Alzheimer's Disease, Mental Illness (2 hours)
- Mental and Behavioral Health Awareness (2 Hours)
- Language Access (1 Hour)
- DC Child and Family Services Agency (CFSA) and Interacting with Juveniles (2 Hours)

**6. MPD should develop a tracking system to ensure all sworn members annually complete the hours and training topics mandated by law, specifically including recognizing and preventing biased-based policing, racism, and white supremacy.**

MPD has a tracking system in place and sends routine reports throughout the year on the members who still need to complete required training. Once MPD was able to recover from the challenges faced during the global pandemic and numerous First Amendment activities that occurred during the audit period, the current system allowed MPD to track all full duty members to ensure they completed the 2024 Professional Development Training.

**7. MPD should develop policies and procedures to continuously vet sworn members for affiliation with white supremacy or other hate groups.**

MPD's code of conduct focuses on members' actions, not their views. As noted in the report, MPD's position is that screening current members' personal opinions, especially as expressed through their social media, could be considered an invasion of privacy. This does not mean, however, that MPD has no mechanisms for identifying inappropriate behavior and holding members accountable.

MPD's strong hiring practices and accountability systems for current members are well designed to detect and investigate allegations of conduct that may demonstrate biased policing behavior. As noted in the report, MPD conducts extensive social media and psychological screenings for sworn officer applicants, and both processes are administered by outside entities to ensure objectivity. For example, in response to one of the PERF recommendations, MPD partnered with the Anti-Defamation League to provide training for background investigators in how to identify potential links to extremist organizations.

In addition, MPD's current misconduct investigation process is both formalized and able to investigate allegations of members involved in discriminatory or unbecoming conduct. Members can submit complaints, like the public, to Internal Affairs through a variety of different channels. Members are also protected against retaliation for the filing of a complaint.

The following are MPD's current protocols for reporting, investigating, and addressing allegations of extremism:

- Internal allegations of extremism against sworn members and all allegations of extremism against civilian staff would be investigated pursuant to General Order 120.20 (Administrative Investigations).

- External complaints of extremism against sworn members would be investigated pursuant to General Order 120.25 (Office of Police Complaints Investigations).
- All sustained allegations are submitted to the Disciplinary Review Division for appropriate remedial action.

Upon the termination of any sworn member of the Department for cause, the Disciplinary Review Division uploads the names of the terminated members to the National Decertification Index to ensure that other law enforcement entities are aware of the misconduct if they apply for other law enforcement related positions. This is for all termination cases, to include those related to white supremacy and hate groups. MPD also searches this database for all pre-employment hires with prior law enforcement experience.

**8. MPD should update GO 120.28’s SSP Indicator Chart, to include OPC allegation categories.**

MPD will review General Order 120.28 and make any necessary updates to ensure that OPC-related allegations are assigned appropriate indicator points.

**9. MPD should update the SSP system’s indicator points for OPC sustained allegations to match the GO’s SSP Indicator Chart.**

MPD will review the discrepancies identified between the Indicator Chart in the SSP General Order and the Personnel Performance Management System and develop a plan to update the system to match the revised chart.<sup>1</sup>

**10. MPD should develop policies and procedures for documenting completed training and MPEAP sessions that include where the documentation should be retained and for how long.**

The MPEAP example identified by the Auditor occurred during the pandemic when many procedures had to be modified to accommodate the current environment. Since that time, documentation of completed MPEAP sessions has improved; however, MPD will examine the policy to determine whether it should be updated to include additional, clearer documentation requirements.

With respect to the training examples in the report, the assigned training was administered by the DC Department of Human Resources rather than MPD, which is why MPD could not directly access the training records. MPD can explore ways to have the officer provide documentation that such training was completed to be included in their SSP file moving forward.

**Factual Corrections**

**Page 4** – The report states, “The Professional Development Bureau’s priorities are to ensure MPD hires the best applicants, provides members with the best training and growth throughout

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<sup>1</sup> This plan will take into account a system limitation that any changes to existing fields will automatically change the points assessed to historical cases.

their careers, and delivers quality service from Human Resources (HR). The Bureau includes the Metropolitan Police Academy Division, Recruiting Division, HR Division, Disciplinary Review Division (DRD), Medical Division, and Curriculum Development and Instructional Design Division.”

MPD’s Human Resource Management Division and Medical Services Division were moved from the Professional Development Bureau to the Organizational Culture and Wellness Bureau as part of an organizational realignment on February 4, 2024.

**Page 20** – The report states, “MPD does have an FBI liaison who informs them if a member is under FBI investigation.” This is not accurate; an MPD member is attached to an FBI task force focused on fraud and public corruption.

In closing, MPD would again like to thank the Auditor for this opportunity to review the draft report and provide a response. Please do not hesitate to contact us if you have any further questions.

Sincerely,

A handwritten signature in black ink that reads "Pamela A. Smith". The signature is written in a cursive, flowing style.

Pamela A. Smith  
Chief of Police

# ODCA Response to Agency Comments

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We appreciate the responses to the draft report provided by MPD and are pleased with MPD's concurrence with Recommendations 2, 4, 5, 8, 9, and 10.

MPD takes exception to Recommendation 1 concerning verifying applicants' self-reported tattoos. MPD cites its current policy on tattoos and states that the meanings of some tattoos may be subjective, and their interpretation therefore should not be left to the background investigator. In response to MPD's comments, ODCA has revised its recommendation by removing "to determine the significance of the tattoo" and changed the focus to the verification of self-reported tattoos during an already-occurring physical examination.

MPD also contends that a civilian law enforcement organization should be viewed differently from the military. While we appreciate that point and the distinction, ODCA notes that in addition to the U.S. military and the California Commission on Peace Officer Standards Training's selection standards which were used as best practices in this report, the Maryland State Police also requires applicants to submit images of all tattoos before a conditional offer is considered.

MPD notes for Recommendation 6 that it has a tracking system in place that sends routine reports on members who need to complete the required training and full-duty members who complete the training. ODCA acknowledges that MPD has a tracking system for training. During the audit, however, MPD indicated that it was unable to use that tracking system to produce reports on members who were active at the time but did not complete training during the specified time frame. After considering MPD's input, ODCA has amended the recommendation to specify that MPD should take such steps as are necessary to use its tracking system to produce a report listing who was not in compliance on any given date.

MPD takes exception to the original Recommendation 7 to continuously vet sworn members. MPD's current mechanisms for identifying inappropriate behavior among sworn members rely on others, internally or externally, to report the behavior to MPD. We acknowledge those mechanisms exist and are frequently used, as shown by the sheer number of complaints that are tracked and that we reviewed. At the same time, it remains possible that the very challenging nature of police work can affect attitudes and behaviors and ODCA stands by the recommendation that MPD continue to consider practices to support maintaining a force free from affiliations with hate groups. We have modified the recommendation to include "periodic or ongoing" screening of current sworn members.

MPD also requests two factual corrections and ODCA has incorporated these into the final report. We appreciate the Department flagging these statements.

Finally, in considering the totality of MPD's comments on the draft report, including the concern that the report's focus could suggest "to both our members and the public that extremism is a pressing issue within the Department" we undertook an additional review of the complaint data ODCA received from MPD. We continue to acknowledge that we did not discover any affiliations with hate groups other than two associations with the Proud Boys captured in the complaint data but already made public. We made the assumption that in directing ODCA to conduct this audit, the Council of the District of Columbia would also have an interest in any evidence of attitudes or behavior that could indicate sympathy with viewpoints

espoused by hate groups. In our final review, we revised our judgment on the seriousness of several incidents and as a result cite a smaller number of allegations believed to be relevant than in the draft report.

We also amended the draft findings on complaints and discipline to more clearly focus on the fact that the Department maintains a robust reporting system that tracks complaints and evaluates and disciplines behaviors considered inappropriate. The report is clear that language that is derogatory in nature does not equate to affiliation with hate groups, could nonetheless indicate sympathy with views espoused by hate groups, and also constitutes behavior that MPD prohibits, monitors, and disciplines when it is reported to have occurred.

We acknowledge these are sensitive subjects and issues. We greatly appreciate the collaboration by the Metropolitan Police Department and hope this largely positive report on a difficult subject has value for the Council and the community.

# Appendix A

## Internal Affairs Department Complaint Data Analysis Methodology

MPD initially provided ODCA with 44,632 allegations (21,719 unique incident summary<sup>54</sup> (IS) numbers).<sup>55</sup> The team removed allegations against civilians or cadets and were left with 43,878 allegations (21,233 unique incidents) which include 30,942 internal allegations, 12,913 external allegations, and 23 allegations that were missing a classification.

Of the 43,878 allegations, 10,585 were sustained allegations (6,678 unique incidents). This total allegation universe includes 159 allegation types, many of which are irrelevant to the audit (e.g., damage to MPD property, vehicle pursuit, DUI/DWI, or mishandling property). The 159 allegation types do not include a category labeled “extremism” or “affiliation with hate groups,” but there is a “bias/discrimination” allegation category. In the total population of unique incidents, there are only three unique sustained incidents categorized as bias/discrimination within our scope period, five unique incidents categorized as bias/discrimination that were not sustained and closed, and seven unique incidents categorized as bias/discrimination with an open status as of January 2024.

Because MPD does not have an allegation category specifically for extremism or affiliation with hate groups and because of the limited number of allegations categorized as bias/discrimination, ODCA selected 85 allegation categories that were potentially related to the audit to look at specific instances of officer behavior in an effort to narrow the allegations to a manageable number for further investigation and determine whether they were related to the audit objectives. Of these 85 allegation categories, 30 were variations of the “use of force” category. ODCA excluded<sup>56</sup> any allegations that were exclusively categorized as such from the analysis because the synopses for these cases focused exclusively on the physical use of force rather than the underlying reason for the use of force. The 55 allegation categories remaining included 5,309 unique sustained incidents potentially related to the audit. The audit team reviewed the synopses of these 5,309 unique sustained incidents.

The results of this review were 151 unique incidents that were likely related to the audit objectives, and 319 unique incidents that were potentially related to the audit objectives.

The audit team reviewed these 470 incidents and determined if the incident was related to the audit objectives. The result of these determinations left 24 sustained unique incidents (35 allegations) between October 1, 2018, and December 31, 2023, that involved activities with an extremist group or bias or discrimination. The 24 sustained unique incidents involved 26 sworn members.

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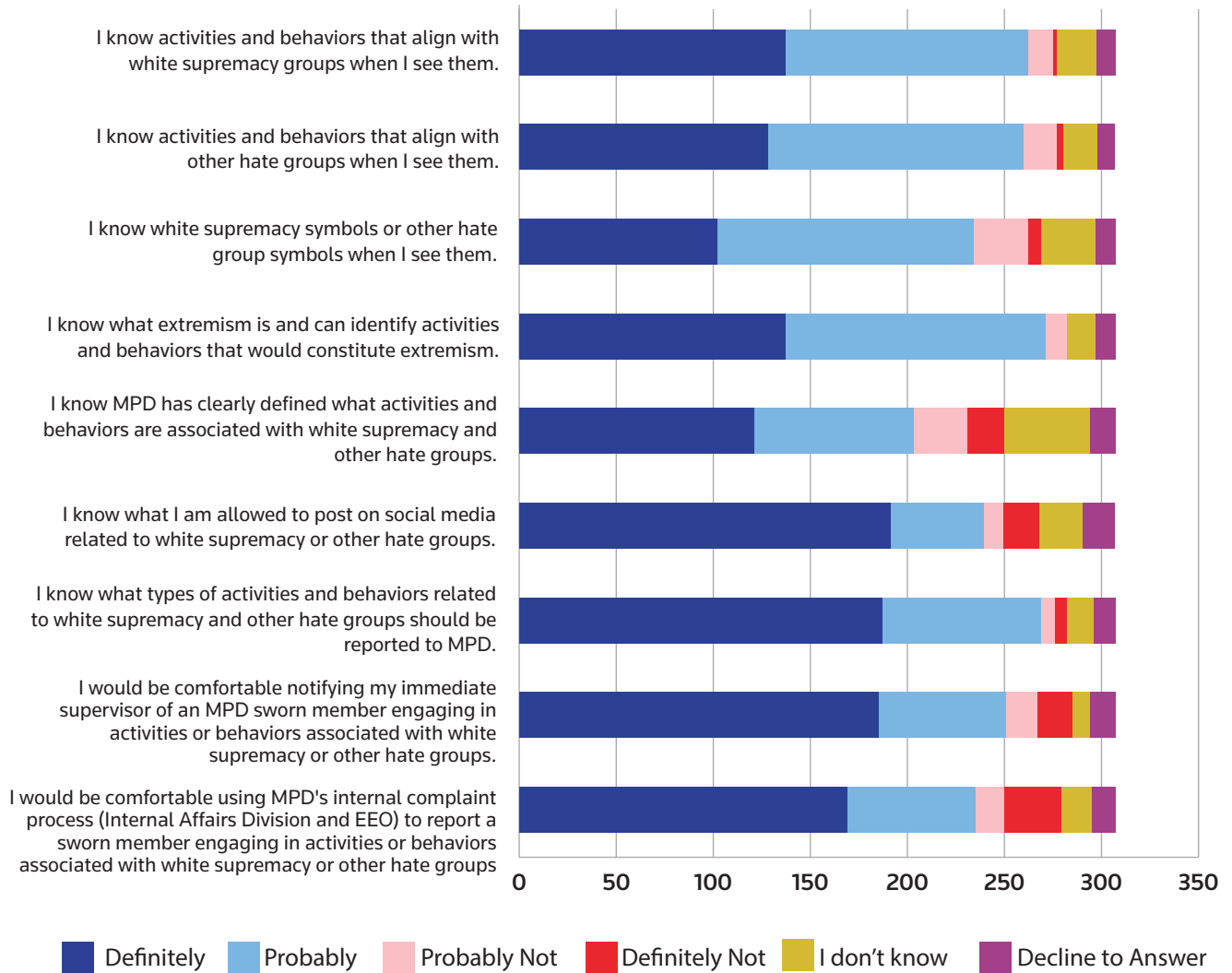
54 Unique cases may include several allegations for multiple members.

55 The data columns include IS number, OPC number, Incident Address, Incident Date/Time, Member Arrested, Date Created, Complaint Type (Internal or External), Incident Type, Incident Allegation, Synopsis, Case Status, Date Closed, Disposition, Disposition Date, Investigation’s Discipline, Findings Disposition, Final Discipline, Final Penalty, Officer Name, Officer Rank, Officer Race, Officer Gender, Officer Assignment, Investigation Allegation, Complainant Name, Complainant Race, and Allegation by Complainant.

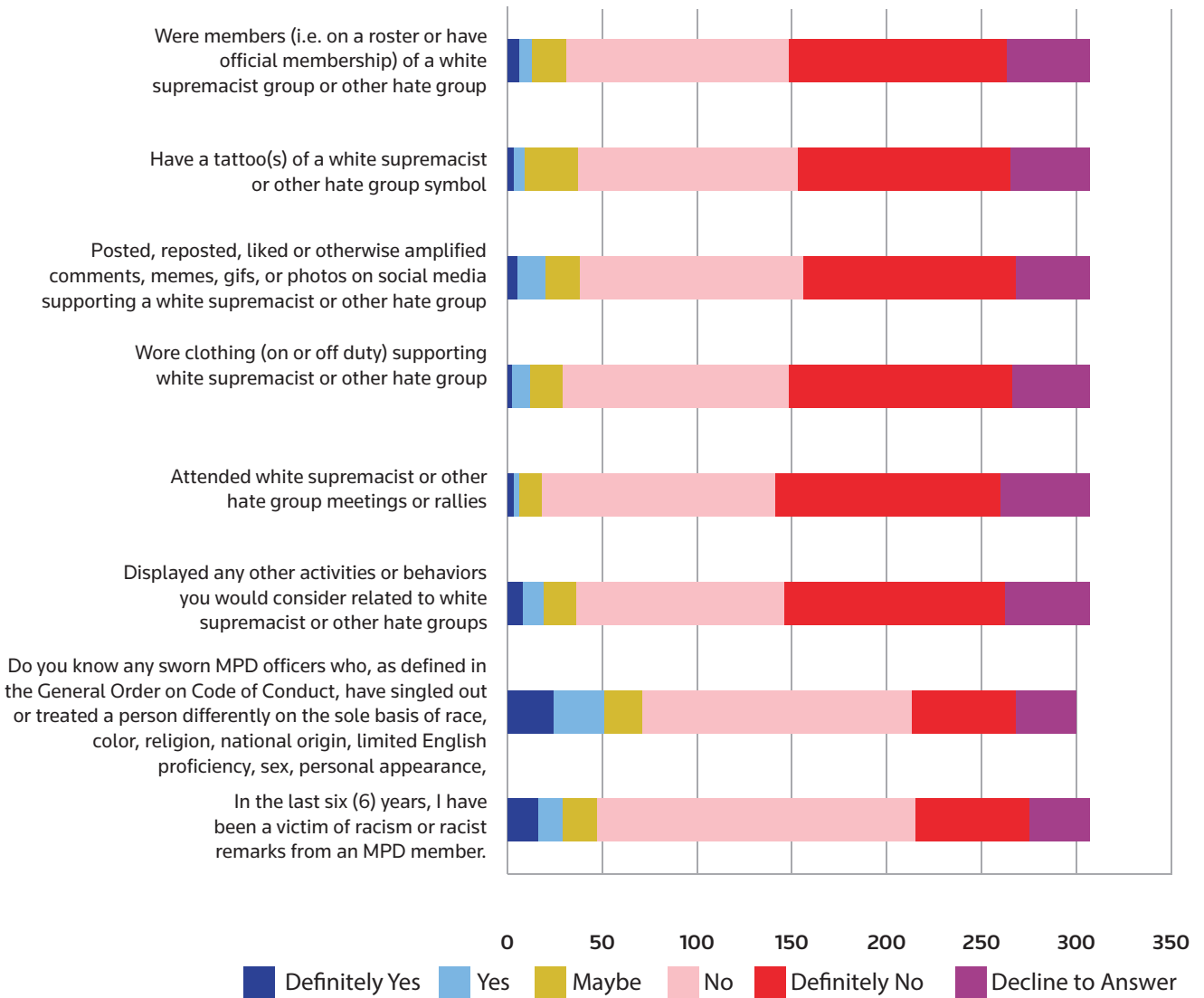
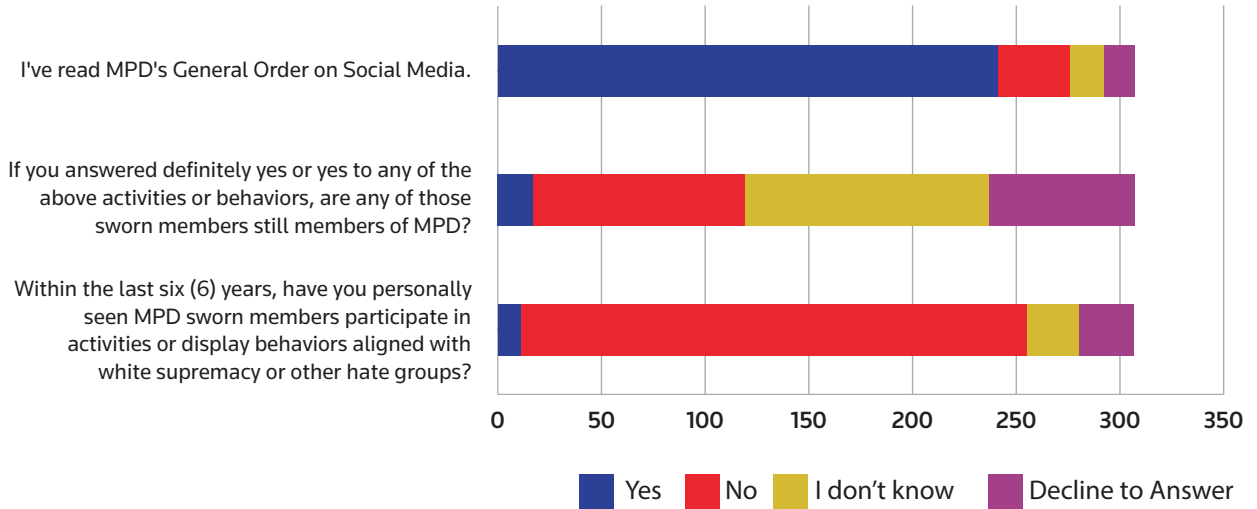
56 Removing the allegations exclusively categorized as “Use of Force” filtered out 15,903 allegations or 6,154 unique incidents.

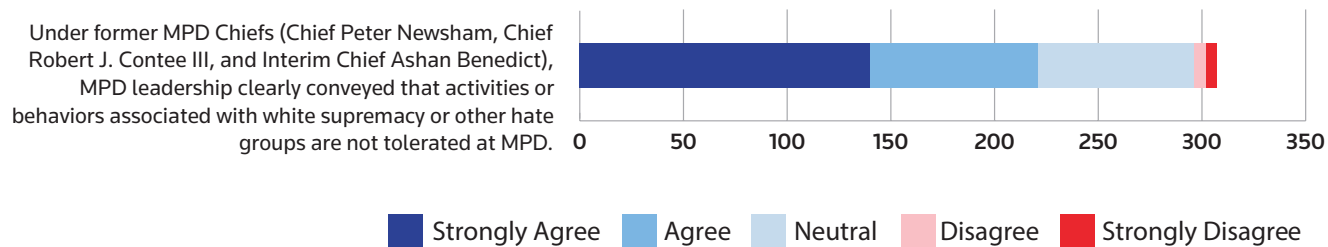
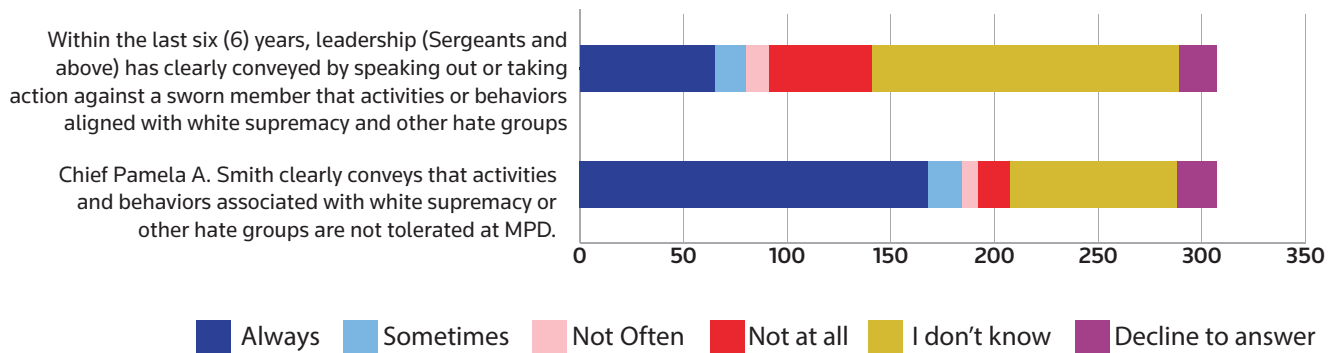
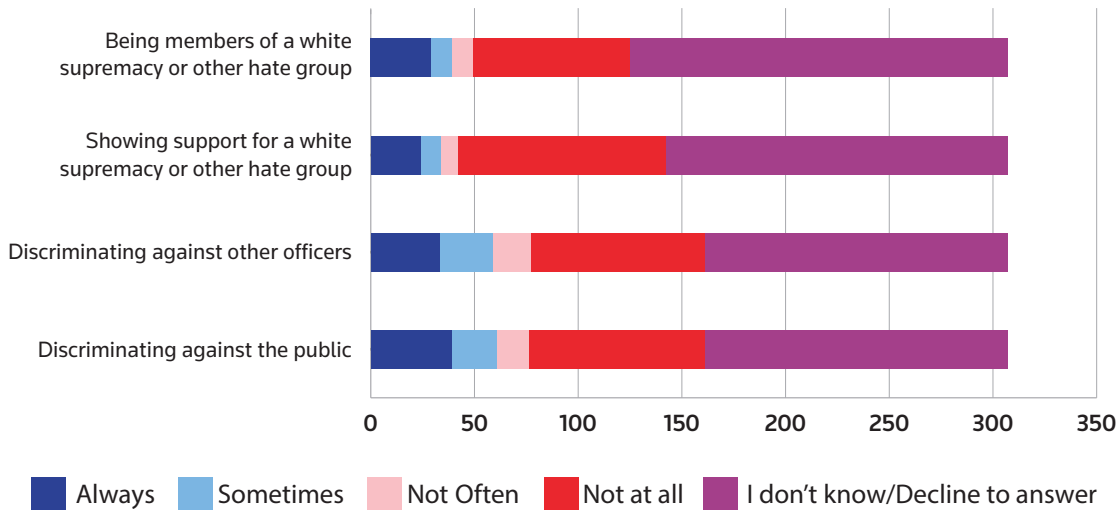
# Appendix B

ODCA distributed a survey to 3,859 sworn and non-sworn employees at MPD and received 307 responses. Below is a summary of the responses.<sup>57</sup>

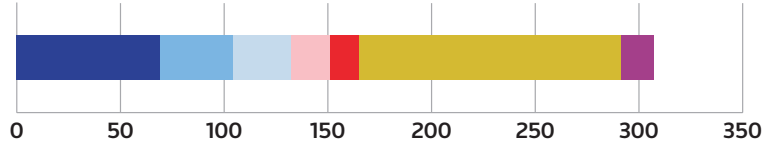


57 The audit team did not include in the survey summary results the open-ended responses to five questions to protect confidentiality.



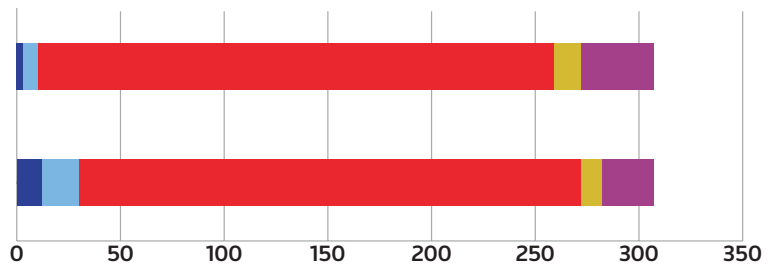


MPD's response to complaints for sworn members engaging in activities or behaviors associated with white supremacy or other hate groups is impartial and fair.

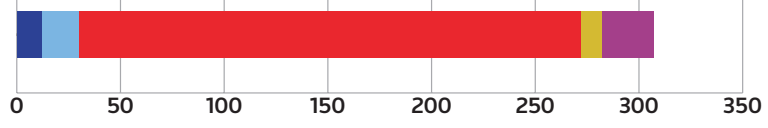


Strongly Agree Agree Neutral Disagree Strongly Disagree I don't know Decline to answer

I have reported a sworn member engaging in activities or behaviors that I knew were associated with white supremacy or other hate groups.

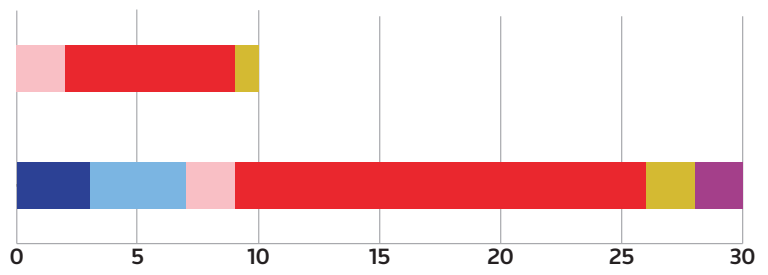


I have reported an officer engaging in activities or behavior that I knew was biased.

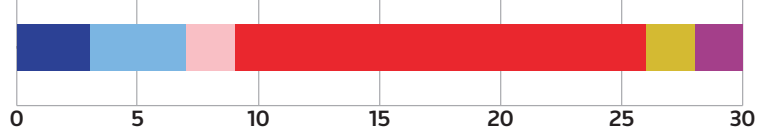


Yes more than once Yes once Never I don't know Decline to answer

If you answered yes once or more than once to reporting a sworn member engaging in activities or behavior, were you satisfied with the outcome of your complaint?

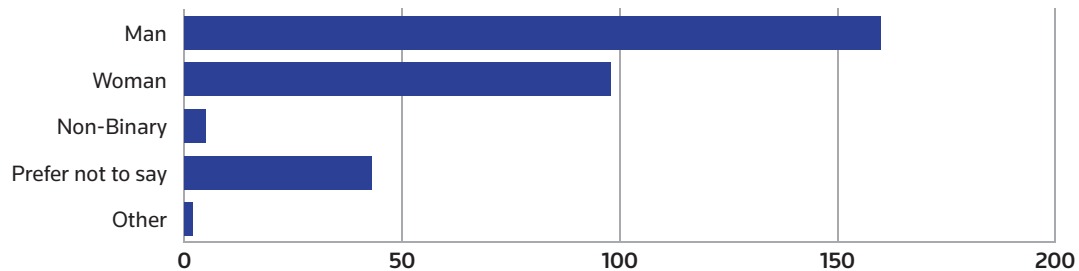


If you answered yes to reporting an officer you knew was biased, were you satisfied with the outcome of your complaint?

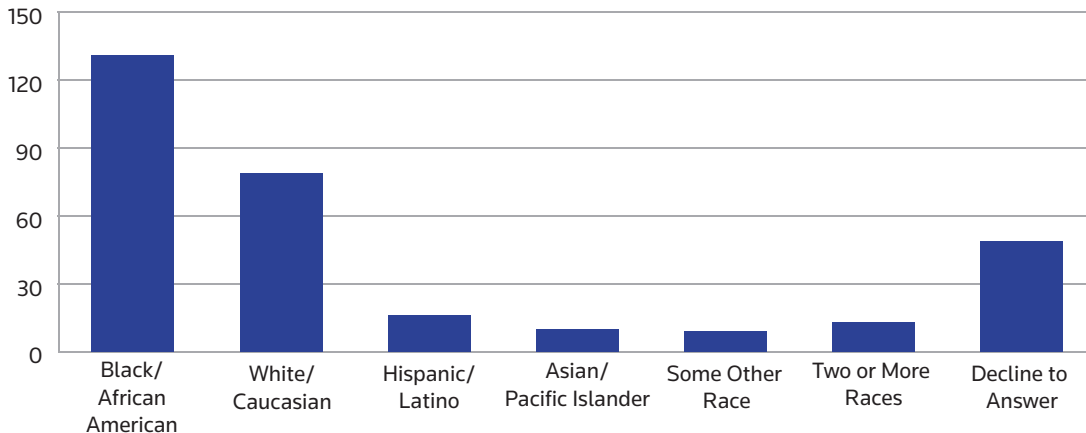


Definitely satisfied Satisfied Somewhat satisfied Not satisfied I don't know Decline to answer

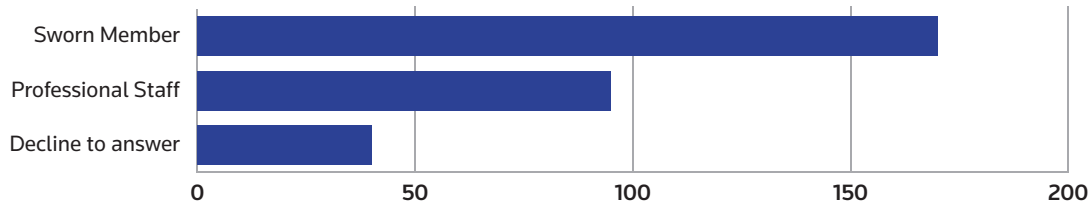
Gender



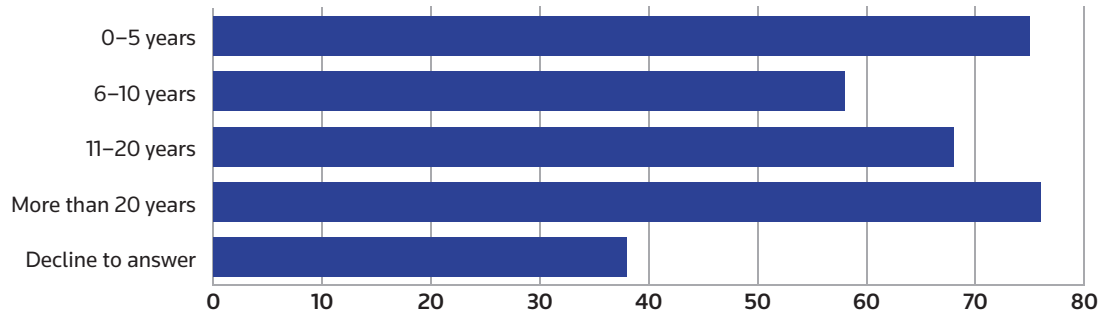
Race/Ethnicity (Check all that apply)



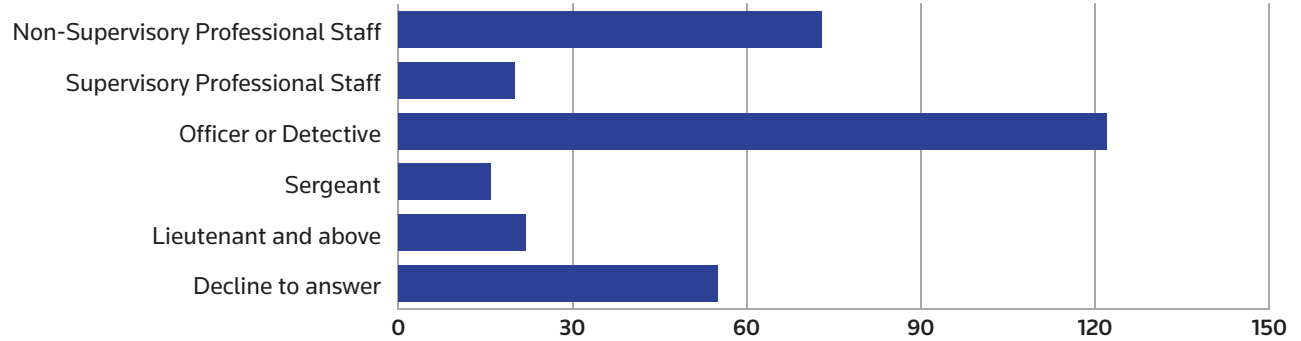
Employee Type



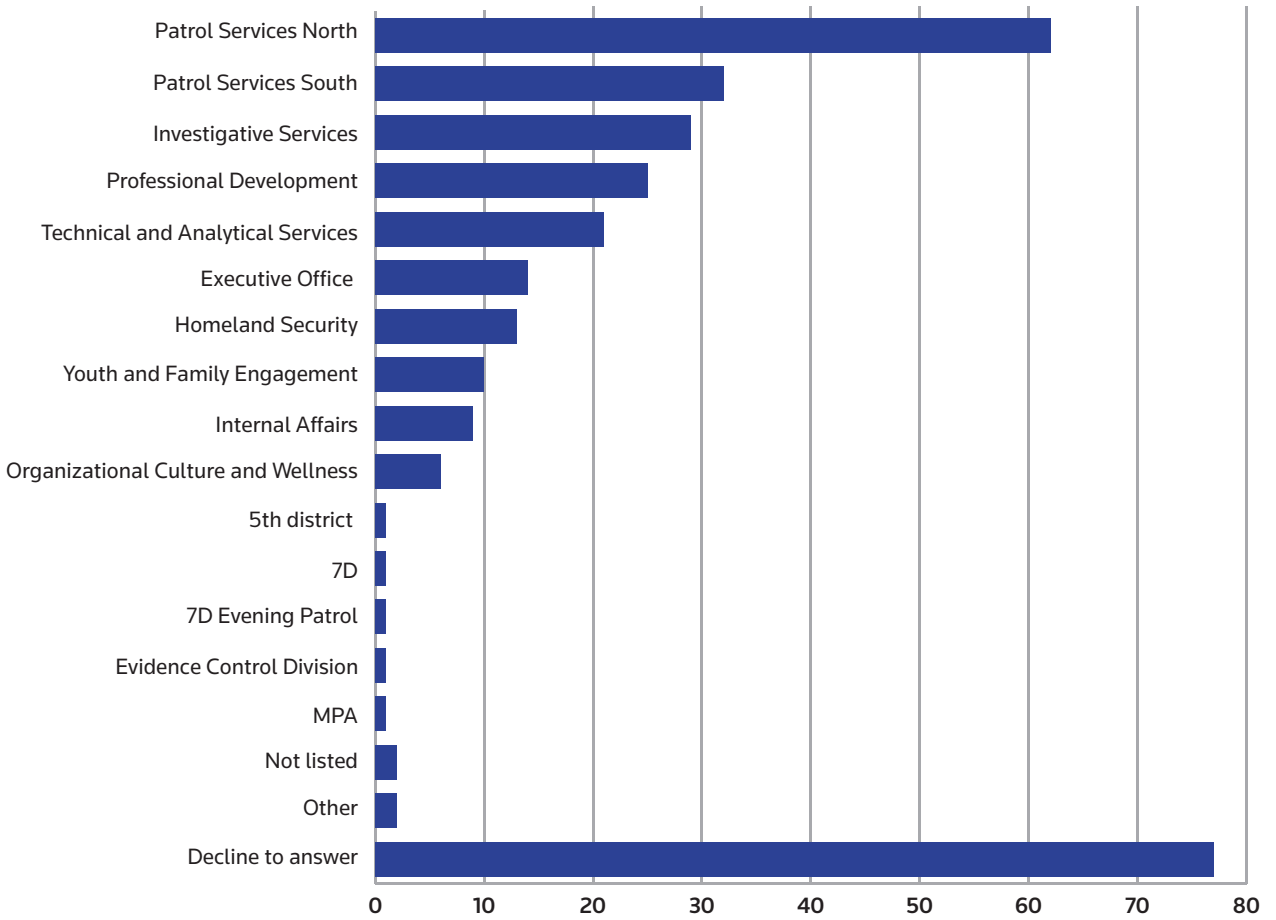
How many years have you work at MPD?



What is your rank or position title?



Which Office or Bureau are you currently assigned to?



# About ODCA

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The mission of the Office of the District of Columbia Auditor (ODCA) is to support the Council of the District of Columbia by making sound recommendations that improve the effectiveness, efficiency, and accountability of the District government.

To fulfill our mission, we conduct performance audits, non-audit reviews, and revenue certifications. The residents of the District of Columbia are one of our primary customers and we strive to keep the residents of the District of Columbia informed on how their government is operating and how their tax money is being spent.

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