

---

# Policy Review of Departmental General Order N-09: Police Grants

Tuesday, May 7, 2024

---



**CITY OF OAKLAND**  
**OFFICE OF THE INSPECTOR GENERAL**

250 Frank H. Ogawa Plaza • Oakland, CA 94612  
Michelle N. Phillips, Inspector General



DALZIEL BUILDING • 250 FRANK H. OGAWA PLAZA • OAKLAND, CALIFORNIA

---

**Tuesday, May 7, 2024**

**Dear Members of the Public,**

The Office of the Inspector General (OIG), was created by legislation in 2020 to strengthen Oakland's police reform efforts, in part, granting the OIG the authority to audit, monitor and review, Oakland Police Department ("Department") policies, practices, and procedures during and after federal oversight. This oversight includes the OIG reviewing current policies and procedures in an effort to identify potential areas of improvement, gaps, or deficiencies.

After media outlets reported that the City of Oakland did not submit its application for the State of California's [Organized Retail Theft Prevention Grant Program](#) (ORTPGP) in September 2023, the OIG self-initiated this review. The purpose of the policy review of Departmental General Order (DGO) N-09: *Police Grants* is to identify potential Department specific recommendations that could clarify the policy and strengthen accountability. The OIG policy review is intended to supplement the City Auditor Office's performance audit of the incident, as this policy review is Department specific. Following its comprehensive review of DGO N-09, the Office of the Inspector General (OIG) identified certain deficiencies, and recommends the Department establish a Grants Management Policies and Procedures (P&P) Manual that includes the following:

1. Specific roles and responsibilities of the Command Staff, Grants Administrator, Grants Project Manager, and Subject Matter Expert in the grant application process.
2. Create a clear process and timeline for the appointment of the Grant Project Manager(s) and Subject Matter Expert(s).
3. Create internal deadlines for key milestones in the grant submission process, that is in advance of any official deadlines.

The OIG suggests the Department consider the following items related to the enclosed recommendations:

1. In consultation with the appropriate stakeholders, assign a Deputy Chief or Deputy Director as the Grant Project Director.
2. Within the Grants Management P&P manual, include processes for the identification and application of grants.

### **Purpose of DGO N-09: Police Grants**

The purpose of DGO N-09 is to set forth Departmental policy and procedures regarding grant applications and awards, and responsibilities for program and fiscal control.



## **Background**

In California, there is a widespread sentiment that crime is rapidly rising, especially retail theft. A 2022 poll conducted by the University of California Berkeley<sup>1</sup> suggested a majority of registered California voters believed crime increased between 2021 and 2022. With almost a third of non-violent crimes going unreported to law enforcement agencies, per the Bureau of Justice Statistics (BJS) estimates, there is limited data to analyze.<sup>2</sup> Nevertheless, in the year examined the BJS data suggests an upward trend in after-hours commercial theft in the State of California. The data also notes that California's Commercial burglary<sup>3</sup> is up 15%, since 2014.<sup>4</sup> As a result, the California Budget Act of 2022 set aside \$85 million in competitive grant funding for anti-theft measures, which was later increased to more than \$242 million.<sup>5</sup> This funding was available on a competitive basis, with 117 law enforcement agencies in California applying and ultimately 38 being awarded funding. The ORTPGP Request for Proposal was released on April 14, 2023.<sup>6</sup> In April 2023, the City of Oakland expressed interest in applying for the ORTPGP, as outlined in emails obtained via the Freedom of Information Act.

## **Methodology**

To get a better understanding of the City of Oakland's grant requirements, the OIG reviewed Administrative Instruction 1050 (AI 1050): *Managing Grant Funds Project*. It should be noted that AI 1050 appears to not have been updated since 2001. The OIG also attempted to identify law enforcement specific grants management policies for jurisdictions in California, particularly those awarded ORTPGP funds. After conducting its research, the OIG was only able to find policies for two of the 38 grant awardees: Los Angeles County Sheriff's Department (LASD) and Sacramento County Sheriff's Department (SCSD). The OIG also identified two additional law enforcement agencies with policies pertinent to its review: Seattle Police Department (SPD) and Atlanta Police Department (APD). In summary, the documents reviewed are the following:

- SPD Policy 1.050 – Grants
- APD Standard Operating Procedure 6070 – Grants Management
- LCSD Manual of Policy and Procedures Volume 2 Chapter 7 – Administrative and Training Division

---

<sup>1</sup> DiCamillo, M. (2022). *Release #2022-01: Festering problems plaguing the state are weighing down Newsom's standing with voters, as concerns about Covid recede* (Berkeley IGS Poll). Berkeley Institute of Governmental Studies. <https://escholarship.org/uc/item/6ft4h17c>

<sup>2</sup>Thompson, A., & Tapp, S. N. (2023). *Criminal Victimization, 2022*. US Department of Justice.

<sup>3</sup> California Penal Code Section 459.5 defines commercial burglary as entering a commercial establishment before or after business hours with the intent of committing larceny.

<sup>4</sup> Lofstrom, M. (2024, January 25). *Testimony: Retail Theft in California*. Public Policy Institute of California. <https://www.ppic.org/blog/testimony-retail-theft-in-california/>

<sup>5</sup> Budget Act of 2022., Senate Bill 154, California Senate (2022). [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220SB154](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB154)

<sup>6</sup> *Organized Retail Theft Prevention RFP*. (2023, April 14). <https://www.bscc.ca.gov/wp-content/uploads/Organized-Retail-Theft-Prevention-Request-for-Proposal-Instruction-Packet.-Final.pdf>



- SCSD General Order 1-26 – Grant Funding

### **Policy Review and Methodology Limitations**

The OIG does not have jurisdiction to review any other city departments that were involved in ORTPGP process. This policy review and analysis focuses exclusively on the DGO N-09, which was established in 2007. While it does not appear DGO N-09 has been updated since then, the Department may have incorporated procedures or practices that were not codified in this policy. The OIG conducted this review at the same time the City Auditor’s Office conducted its performance audit. [City Auditor’s full performance audit](#) of the ORTPGP, which was publicly released April 30, 2024, yielded several findings and recommendations.

Additionally, the OIG discovered there were limited grants management policies specific to a law enforcement agencies. However, there are several citywide grants management policies that govern a centralized procedure.

Finally, the OIG did not conduct any detailed interviews during this review as the focus was to analyze the written policy and identify any gaps.

### **Recommendations and Consideration**

With its limited scope, the OIG identified three recommendations and two considerations. The OIG believes these recommendations are best implemented via the creation of a Grants Management P&P Manual.

**Recommendation 1: Specify the roles and responsibilities of the Command Staff, Grants Administrator, Grants Project Manager, and Subject Matter Expert in the grant application process.**

Greater clarity is needed regarding the delegation of roles when submitting a grant application. Several designations are referenced within DGO N-09, but it is unclear what tasks or duties those positions are responsible for during the grant’s application process. The absence of clear guidelines and internal controls leaves subjectivity in the process and could limit culpability.

**Recommendation 2: Create a clear process and timeline for the appointment of a Grants Project Manager(s) and Subject Matter Expert(s).**

Defined roles will have a limited impact if the Department is does not provide timelines for the appointment of Grants Project Managers and Subject Matter Expert. In its review, the OIG found that it took nearly a month to appoint a Grants Project Manager for the ORTPGP application. Additionally, it took another two weeks from that appointment to select a Subject Matter Expert. By establishing appointment timelines (i.e., a Grant Project Manager must be selected within a week of the command structure’s expressed desire to apply for the grant) the Department can



ensure that the Grants Project Manager and Subject Matter Expert are present from the initiation of the grant's application process. With these individuals primarily responsible for the completion of the grant, it is imperative that they are involved in every step of the process.

**Recommendation 3: Create internal deadlines for key milestones in the grant submission process, that is in advance of any official deadlines.**

While the lack of defined roles and delays in appointments may hinder the grants application process, even a flawless policy risks failure at the hands of unexpected events. To mitigate unforeseen circumstances, in future grant opportunities, the OIG recommends the Department institute internal deadlines for grant submissions. By applying for grants earlier, the Department may be able to correct any errors that may exist at submission prior the grant's final deadline.

**Consideration 1: In consultation with the appropriate stakeholders, assign a Deputy Chief or Deputy Director as the Grant Project Director.**

To help support the operations of the Department, the Chief of Police has a command staff that can fulfill important functions in their absence. Grants management can be a tedious endeavor with several deadlines, administrative responsibilities, and deliverables as well as milestones. A Deputy Chief or Deputy Director could have the ability to monitor the process more closely with the assistance of the Department's Fiscal Services Division Manager.

**Consideration 2: Within the Grants Management P&P Manual, be sure to include processes for the identification and application of grants.**

Grants are highly diverse, with each grantor having their own process for grants outreach and application. No singular process is sufficient in terms of identifying and applying for all grants for which the Department may be eligible. However, there are likely several major grantors that regularly release grants that the Department has interest in. The inclusion of processes for the identification of and application to grants from these major funders within a new grants management P&P may be beneficial.

**Conclusion**

The OIG's policy review of DGO N-09 yielded the following recommendations:

1. Specify the roles of the Command Staff, Grants Coordinator, Grants Project Manager, and Subject Matter Expert in the grant's application process.
2. The creation of a clear process and timeline for the appointment of a Grants Project Manager(s) and Subject Matter Expert(s).
3. The creation of an internal grant submission deadline in advance of any formal grant submission deadline.



The OIG suggests the Department also consider:

1. In consultation with the appropriate stakeholders, assign a Deputy Chief or Deputy Director as the Grant Project Director.
2. Within the Grants Management P&P Manual, include processes for the identification and application of grants.

The grants process is long and arduous, with many potential failure points. A clear and thorough policy is a tool to minimize missteps. Several City of Oakland staff members within the Oakland Police Department and Economic and Workforce Development Department worked diligently on the ORTPGP application, following relevant policies along the way, but unfortunately failed to submit the application prior to its closing date, and so missed the opportunity to be considered for the ORTPGP grant. The OIG hopes that the enclosed recommendations will help optimize the City of Oakland's ability to secure public safety grants as we move the city forward.

Sincerely,

**Michelle N. Phillips, Inspector General**  
City of Oakland, Office of the Inspector General

**OAKLAND POLICE  
DEPARTMENT'S RESPONSE**



# MEMORANDUM

**TO:** Michelle Phillips  
Inspector General  
Office of the Inspector General

**FROM:** Darren Allison  
Interim Chief of Police  
Oakland Police Department

**SUBJECT:** Policy Review of Departmental  
General Order N-09: Police Grants

**DATE:** April 30, 2024

---

The purpose of this memorandum is to respond to the Office of Inspector General's (OIG) recommendation to establish a Grants Management Policies and Procedures (P&P) Manual with clearly delineated roles and responsibilities, a clear process and timeline for appointing employees to key positions that impact the grant process and implementing internal deadlines for important milestones in the grant submission process.

## **EXECUTIVE SUMMARY**

This memo details the Department's response to the OIG's report on the policy review of Departmental General Order (DGO) N-09: Police Grants and the recommendations outlined in the report.

## **BACKGROUND**

In September 2023, media outlets reported that the City of Oakland did not submit its application for the State of California's Organized Retail Theft Prevention Grant Program (ORTPGP). As a result of the missed opportunity and to supplement a performance audit conducted by the City Auditor's Office, the OIG reviewed DGO N-09: Police Grants for potential OPD-specific findings and policy recommendations.

## **ANALYSIS**

DGO N-09: Police Grants, which establishes departmental policy and procedures regarding grant applications, awards, and responsibilities for program and fiscal control, was last updated in September 2007. This policy outlines the process for staff assigned to the Fiscal Services Division and respective commanders/managers to complete the grant application process. However, the policy does not accurately reflect changes to the grant process that have occurred since 2007 or accurately define the roles of those involved in the grant preparation process, including the Grants Coordinator and Subject Matter Experts (SMEs).

OPD recognizes the importance of clearly defining and codifying the specific roles and responsibilities of each person involved in preparing and submitting grants. Given the evolution of technology and roles within OPD since DGO N-09 was last updated and recognizing that some of the processes outlined in the policy are outdated, OPD agrees that updating the policy



is a priority and concurs with the recommendations outlined in the report, which include the following:

1. Specific roles and responsibilities of the Command Staff, Grants Administrator, Grants Project Manager, and Subject Matter Expert in the grant application process.
2. A clear process and timeline for the appointment of the Grant Project Manager(s) and Subject Matter Expert(s).
3. Internal deadlines for key milestones in the grant submission process before official deadlines.

In addition to specific recommendations, the OIG has suggested the following for OPD's consideration:

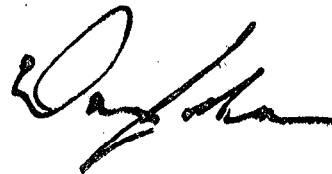
1. In consultation with the appropriate stakeholders, assign a Deputy Chief or Deputy Director as the Grant Project Director.
2. Within the Grants Management P&P manual, include processes for the identification and application of grants.

The Department agrees that a high-ranking departmental representative should serve as the Grant Project Director. However, it believes this role can be filled by a Captain or above, or a professional staff equivalent, not exclusively by a member of the Executive Team. Captains and senior managers are responsible for overseeing divisions, developing and executing organizational strategies, and offering guidance for their respective areas of control. Given the authority granted to Captains and professional staff managers, the Department believes they are sufficiently equipped to fulfill the role of Grant Project Director.

The Department agrees that the Grants Management P&P Manual should include processes for identifying and applying for grants. This update will be included in the manual.

The Fiscal Services Division Manager will collaborate with the Policy and Publications (P&P) Unit to revise DGO N-09. However, given the current workload and priorities, this policy update must be prioritized among the 50 other policies currently in process. It is estimated that it will take approximately six months to one year to complete this policy.

For questions regarding this report, please contact Deputy Director Kiona Suttle, Bureau of Services, at [ksuttle@oaklandca.gov](mailto:ksuttle@oaklandca.gov).



Darren Allison, Interim Chief of Police  
Oakland Police Department

Reviewed by:  
LaRajia Marshall, Fiscal Services Division  
Manager  
OPD, Bureau of Services

Prepared by:  
Kiona Suttle, Deputy Director  
OPD, Bureau of Services



---

**Follow the #OaklandOIG on social media:**



Search **@OaklandOIG** on Instagram & Twitter,  
“City of Oakland, Office of the Inspector General” on LinkedIn & Facebook



**Newsletter**

Scan the QR code to sign-up for the OIG mailing list or visit  
[tinyurl.com/OIGMailingList](https://tinyurl.com/OIGMailingList).



Email [oig@oaklandca.gov](mailto:oig@oaklandca.gov)



Call (510) 238-2088



Visit <https://www.oaklandca.gov/departments/inspector-general>