

## Analysis of the SDPD Online Complaint Portal

### I. Why This Audit Demands Immediate Action

To understand how well San Diego’s Police Department serves residents who need to report officer misconduct, we conducted a **comprehensive accessibility and usability audit** of the Department’s online intake pathway, specifically the “File a Complaint” landing page and its SeamlessDocs web form. The assessment combined three methods:

1. **Device Testing:** We tested the complaint process on current-generation iPhone, Android, and desktop browsers, observing where controls disappeared or failed.
2. **Assistive-Technology Simulation:** Using screen-reader software (VoiceOver, NVDA), switch-control emulators, and keyboard-only navigation, we verified whether a user with visual, hearing, or mobility impairments could complete each step.
3. **Standards Benchmarking:** We measured the portal against WCAG 2.1 AA (web accessibility), Title II ADA (disability rights), Title VI and the Dymally-Alatorre Act (language-access laws), and best practices from leading oversight bodies such as NYC CCRB and Chicago COPA.

#### Key Definitions for Non-Specialists

- **WCAG 2.1 AA:** International web-accessibility guidelines that specify, for example, text contrast and screen-reader labels.
- **TTY/VRS:** Telephone services that let Deaf or Hard-of-Hearing users communicate via text (TTY) or video sign language (VRS).
- **POBRA One-Year Rule:** California law (Gov. Code § 3304(d)) that bars police discipline if an investigation drags beyond one year after the agency first learns of the allegation.
- **Limited-English-Proficient (LEP):** Residents who speak English “less than very well” and thus require information in their primary language.

Our findings show the portal “frozen” in a desktop-era design that systematically blocks or discourages entire user groups:

- **Deaf/Hard-of-Hearing residents:** No TTY or VRS number, and the form offers no interpreter prompt.
- **Blind/Low-Vision users:** Screen readers cannot locate the unlabeled upload icon; the form’s PDF is actually a flattened image, so text cannot be read aloud or selected. Images do not have Alt text ( Image description for VoiceOver)
- **Mobile-only households (≈ 70 % of city residents):** The attach button disappears on common iOS and Android viewports. A single one-minute 4-K clip already exceeds the 250 MB per-file limit, and merging or compressing videos is not possible on most phones.
- **Residents with mobility impairments:** Switch-control (a pressure sensor used to navigate, line by line), navigation stalls on non-standard buttons; links embedded in images are unreachable.

- **LEP communities (Tagalog, Vietnamese, Chinese, Korean, Arabic):** The form is English- and Spanish-only, contrary to state and federal language-access rules.

These barriers are not abstract. They **delay evidence collection**, pushing cases toward the POBRA one-year expiration; **inflate overtime** as investigators chase missing uploads or schedule second interviews; and **expose the City to ADA and Title VI litigation**, liabilities that have cost peer jurisdictions hundreds of thousands of dollars.

Although the page displays a link to the Commission on Police Practices (CPP), that link does **not** resolve the problem; CPP runs a separate intake workflow and does not rely on this obsolete SDPD form. In fact, the CPP address embedded in the SDPD form is out-of-date, creating additional confusion.

Until SDPD replaces this inaccessible portal with a mobile-first, multilingual, ADA-compliant interface, complaints will continue to stall at the front gate, investigations will drag, and public confidence will erode. Put plainly: the current system is not merely inefficient, it is inequitable. Every day it remains online the City's legal and moral debt deepens.

## II. Findings at a Glance

Critical Dimension	Current State	Daily Community Impact	Investigative Impact
Mobile Evidence Upload	Attachment icon clipped off-screen; no keyboard/ARIA	Mobile-only users (majority in Districts 4, 8, & 9) abandon upload	IA starts without key videos; must schedule retrieval
File Quota	3 files × 250 MB; GoogleDrive and Box access - DropBox access is not functional	Ring clips and 4-K phone videos exceed limit	Extra 7 hrs investigator time; +21 days delay
Narrative Limit	1 500 characters (~250 words)	Trauma survivors & LEP complainants forced to omit details. Translations from English to Spanish add 15-30% more characters on average.	Follow-up interview adds 4 hrs; +14 days delay
Accessibility	No alt-text, low-contrast links, untagged PDFs, no TTY/VRS banner	Blind/low-vision & Deaf/HoH residents cannot complete form unaided	Potential ADA suit; missing complaints community members with Accessibility needs.
Language Access	English/Spanish only	Tagalog, Vietnamese, Chinese, Korean, Arabic speakers (>5 %) effectively barred	Title VI exposure; under-reporting in key patrol areas
Status Transparency	Seamless Docs Portal	Tracking Portal link is not available on the complaint portal landing page. There is no complaint number generated for third-party reference or way to submit complaint without making a seamless docs account.	Repeat inquiries clog IA admin queue. Common questions must be addressed early on and the process must be fully transparent and accessible. Not truly anonymous

Officer Fields	<ul style="list-style-type: none"> <li>• Single officer; no space for CHP, Sheriff, ICE, campus PD.</li> <li>• No description field or photo upload is available.</li> <li>• No note field to input officers relevance in allegation.</li> </ul>	<ul style="list-style-type: none"> <li>• Multi-agency encounters (border task forces, protests) under-documented. Field should allow for description of officer/officer uniform. Note field added to allow complainant area to describe the involvement of officer.</li> <li>• How to document, out of Jurisdiction enforcement by SOU not mentioned.</li> <li>• Form must allow for notes on witnesses to encounter, allow field for how many officers were on scene. If supervisor was involved (conflict of interest).</li> <li>• Differentiate Formal vs Informal investigations.</li> <li>• Inclusion of Traffic violations by officer - field to add License plate of vehicle/ motorcycle with allegation details.</li> </ul>	<p>Mis-ID causes misclassified findings (“unfounded”) Add all relevant information for navigating these situations to FAQ.</p> <p>Complainants should be able to provide as much information about the subject officer and all officers at the scene during intake process.</p>
Empower Complainants	No current resource on Allegation, US-of Force Matrix or link to policy manual on complaint page.	Many residents do not know policing jargon (“ <i>Category I vs. Category II</i> ,” “ <i>unreasonable search</i> ”). A short, plain-language menu “ <b>Excessive Force,</b> ” “ <b>Bias,</b> ” “ <b>Failure to Provide Medical Aid,</b> ” etc.helps them articulate concerns accurately.	<ul style="list-style-type: none"> <li>• Fewer vague narratives (“The officer was rude”)</li> <li>• Faster triage by Internal Affairs</li> <li>• Higher complainant confidence that the issue is understood</li> </ul>
Assist Vulnerable Populations	Allow resource on Allegation to be thoroughly vetted for ADA & Title VI compliance	LEP, Deaf/HoH, and cognitively impaired users benefit from structured choices and clear definitions; screen readers can easily announce labeled checkboxes.	<ul style="list-style-type: none"> <li>• ADA &amp; Title VI compliance</li> <li>• More complete complaints from communities that historically under-report</li> </ul>

### III. Legal Imperatives

#### 1. POBRA §3304(d) – One-Year Discipline Clock

California courts (*Mays, Pedro, Garcia*) void discipline if notice is not served within one year of **the agency’s discovery** of misconduct. Portal-induced delays (table above) add ≈ 63 days per Category-I case, pushing median timelines to ~300 days, leaving a razor-thin margin before the 365-day cutoff. The CPP audit already logged a Category-I case that breached the limit and “dozens that approached it.” Consider how many complaints are tossed out due to lack of information on intake as well as the necessary follow-up on every complaint because of the constraints. We must also consider that the SDPD is the highest funded department in San Diego and has existed since 1889. This complaint process should have been refined years ago and needs to be reassessed regularly to ensure compliance.

#### 2. ADA & Web Accessibility

Title II guarantees “*effective communication.*” Cases like *NFB v. Lamone* and *Payan v. LACCD* confirm that non-WCAG portals constitute discrimination, inviting DOJ consent decrees and six-figure settlements. The current form fails every WCAG 2.1 AA criterion for non-text content, keyboard access, color contrast, and language tagging.

#### 3. Title VI & Dymally-Alatorre Act

Agencies receiving federal funds must provide “meaningful access” to LEP users. Tagalog, Vietnamese, and Chinese exceed the 5 % trigger in multiple SDPD divisions; yet no translated form exists. DOJ settlements with Denver PD (2022) and Alameda County Sheriff (2024) show the financial and supervisory consequences of non-compliance.

### IV. UI/UX Failure Points (Designer’s Lens)

Jakob Nielsen, a pioneer in human-computer interaction, identified **10 universal “heuristics”- simple rules of thumb that define good interface design**. They are widely taught in design schools and used by companies like Apple, Google, and Microsoft as a checklist for usability audits. Below are the five heuristics most relevant to SDPD’s complaint portal, each followed by the specific way the site violates that rule.

Nielsen Heuristic	Plain-English Definition	Violation in SDPD Portal
<b>1. Visibility of System Status</b>	The system should always keep users informed about what is going on, through timely feedback.	Confirmation e-mail gives no follow-up link, case number, or assigned investigator. Users cannot tell if additional files can be added later or how to add those files. FAQ does not provide this information or describe the difference between formal and informal investigations.
<b>2. Match Between System and the Real World</b>	Use familiar language and concepts; do not force users to translate computer jargon.	PDF instructs users to “Print and sign, at the bottom” implying online submission isn’t valid, and complainant must also go into department to file the complaint, this contradicts modern mobile expectations.
<b>3. User Control and Freedom</b>	Users need a clearly marked “emergency exit” to undo mistakes.	1500-character box cuts off text without warning; no option to expand or undo, forcing a full rewrite. Translation into Spanish adds 15-30% more characters. Most languages translated from English follow the same logic.
<b>4. Flexibility and Efficiency of Use</b>	The interface should work for both novices and experts, and adapt to different needs.	No interpreter toggle, contrast mode, or large-print option; fixed English UI.
<b>5. Error Prevention</b>	Better than good error messages is a design that prevents a problem from occurring.	Attachment icon clipped off-screen on iOS/Android; unlabeled buttons make it impossible for screen-reader or switch-control users to upload evidence in the first place.

Because these heuristics are foundational, each violation compounds friction, turning the complaint portal into a *maze* rather than a *funnel*. This is exactly the opposite of what an accountability interface should do.

## V. Operational & Fiscal Consequences

Cost Center (Five Years)	Exposure Without Fix	Cost with Modernization
ADA / Title VI litigation & monitoring	\$1.3 M–\$2.0 M	<b>\$40 K</b> one-time + <\$10 K/yr
Investigator overtime (follow-ups)	\$450 K	≈ \$90 K (80 % reduction)
Federal consent decree monitor	\$1.75 M	Avoided
<b>Total</b>	<b>≈ \$3.5 M</b>	<b>≈ \$100 K</b>

## VI. Existing City Resources Untapped

1. **Office of ADA Compliance & Accessibility** – Can support with compliance
2. **City Language Access Program** – Translates Council agendas into eight languages; SDPD can ask for translation of document and ensure compliance.
3. **IT & Digital Services** – ‘Get It Done’ status-tracker can be cloned for complaint milestones by IT in < 30 days, using existing micro-services. The code for this should already exist - we are not reinventing the wheel.

## VII. 90-Day Action Matrix

Category	Specific Action	Key Benefit / Outcome
<b>Mobile &amp; Evidence Intake</b>	<ul style="list-style-type: none"> <li>• Anchor attachment button; add <code>aria-label="Attach evidence"</code>; include in keyboard tab order</li> <li>• Raise quota → ≥ 10 files or 3 files × 2 GB; accept ZIP &amp; Google/Dropbox links</li> <li>• Mirror change in Citizen Online Reporting (current 20 MB cap, no video)</li> <li>• Auto-confirmation e-mail with secure follow-up upload link</li> </ul>	Ensures mobile, screen-reader, and keyboard users can attach all evidence; eliminates repeat retrieval trips; aligns report portal with complaint portal; preserves chain of custody for late-found media
<b>Narrative &amp; Officer Detail</b>	<ul style="list-style-type: none"> <li>• Remove 1 500-character cap; add expandable autosave field</li> <li>• Provide repeatable officer blocks (≥ 4) with transport mode &amp; uniform description</li> <li>• Add section for non-SDPD officers (CHP, Sheriff, CBP/ICE, campus PD) plus direct links to their complaint sites</li> </ul>	Captures full sequence of events in one submission; prevents mis-identification; documents multi-agency incidents; reduces follow-up interviews and statute-clock risk
<b>Accessibility &amp; Language Access</b>	<ul style="list-style-type: none"> <li>• Conduct full WCAG 2.1 AA audit &amp; remediation; tag PDFs; add large-print/Easy-Read versions</li> <li>• Install ADA banner with voice hotline, TTY, RTT, VRS, and accommodation request form</li> <li>• Translate entire portal and documents into Spanish, Vietnamese, Tagalog, Chinese, Korean, Arabic; add interpreter hot-key</li> </ul>	Achieves ADA Title II and WCAG compliance; meets Title VI & Dymally-Alatorre mandates; enables Deaf/Blind and LEP residents to file independently
<b>Transparency &amp; Trust</b>	<ul style="list-style-type: none"> <li>• Launch public status tracker (case #, milestones) leveraging <i>Get It Done</i> infrastructure</li> <li>• Produce ASL explainer video with open captions and downloadable transcript</li> </ul>	Provides real-time procedural visibility; boosts community trust; satisfies procedural-justice best practice
<b>Social-Media Evidence Workflow</b>	<ul style="list-style-type: none"> <li>• Add dedicated “Social-Media URL” input</li> <li>• Publish <b>#SDPDComplaintEvidence</b> guidance in FAQs and confirmation e-mails</li> </ul>	Captures TikTok/Instagram/YouTube evidence; zero-cost storage; preserves provenance of user-generated content

## VIII. Timeline, Overtime, and Statute Risk Addendum

Portal delays add  $\approx$  **28 investigator hours** and **63 calendar days** per complex Category-I case:

Delay Driver	Added Hours	Added Days
Evidence retrieval (file cap)	+7 h	+21 d
Narrative re-interview	+4 h	+14 d
Officer mis-ID research	+3 h	+10 d
Follow-up upload workaround	+6 h	+18 d
LEP interpreter redo	+8 h	+28 d
<b>Total</b>	<b>+28 h</b>	<b>+63 d</b>

SDPD routinely approaches the one-year statutory limit as found by Audit recently conducted by Jerry Threet, thus inviting disciplinary nullification.

## IX. Conclusion & Call to Action

The existing complaint portal dissuades residents daily, especially those who are mobile-only, Deaf, Blind, or Limited-English-Proficient. It stifles evidence at the front door, inflates investigative timelines, and exposes the City to multimillion-dollar liabilities. By investing **0.01 % of the Department's annual budget**, SDPD can transform a liability into a national model of accessible, mobile, multilingual, and transparent policing oversight simultaneously safeguarding discipline, reducing overtime, and honoring San Diego's smart-city promise.

**Immediate executive direction is the only missing element.** The internal ADA, translation, and IT resources exist; the legal mandate is clear; the fiscal logic is overwhelming. Acting within 90 days will align SDPD with federal law, city policy, and community expectation, demonstrating that accountability begins not with a badge number but with a usable, inclusive digital doorway.

*Respectfully submitted,*

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