

COPY

**Bill Finney & Associates, LLC**

---

William K. Finney, CEO  
949 Pine View Court  
Saint Paul, MN 55119

January 2, 2019

Chief Todd Axtell  
Saint Paul Police department  
367 Grove Street  
Saint Paul, MN 55101

RECEIVED  
JAN 02 2019  
CHIEF'S OFFICE

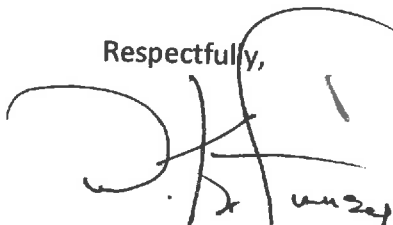
Chief Axtell,

Please find attached to this letter the final report on the Saint Paul Police Department canine audit. This written document was identified by contract as the final deliverable for this project.

Bill Finney & Associates, LLC appreciated the cooperation of your department allowing comprehensive access to the canine unit, your personnel, policies and reports. Bill Finney & Associates, LLC commends the professionalism of the men and women of your department who participated with or were subject to the audit process.

Please let me know if you would like to discuss this matter or if you have any questions about the recommendations contained in the final report.

Respectfully,



William K. Finney, CEO  
Bill Finney & Associates, LLC

## **Bill Finney & Associates, LLC**

---

William K. Finney, CEO  
949 Pine View Court  
Saint Paul, MN 55119

### **Introduction**

Bill Finney & Associates, LLC provides expert consulting and audit services in the area of police operations. Its principal, Bill Finney is a law enforcement leader and expert with more than 30 years of law enforcement experience. Bill Finney became Minnesota's first African-American police chief when he took over the St. Paul police department in 1992. Bill Finney retired from the St. Paul Police department in 2004, but continued to serve as a community leader, including as a St. Paul City Council Member in 2015.

In July 2018, following an incident where an innocent bystander was bitten by a police canine, Bill Finney & Associates, LLC was contacted by the City of St. Paul administration and the St. Paul Police administration to evaluate St. Paul Police Department canine unit operations. Upon agreement, Bill Finney & Associates, LLC was hired to conduct this audit of the St. Paul Police Department canine unit.

### **Background of the Audit**

The St. Paul Police Department canine unit began in 1958, and is the third oldest unit in the country. The unit supports patrol operations as a locating tool and force option. The canine unit is a highly specialized unit working with specially-trained police canines, which are deployed to locate the source of human scent as well as narcotics and explosive odors. When necessary, police canines are used to gain suspect compliance using less-than-lethal force. Canine teams spend months in basic training classes and following that are mandated to perform skill development training each month. Each canine team requires certification in several disciplines.

The audit focused on the calendar years from 2012 to 2018. During that time, St. Paul's canine unit deployed more than any other specialized unit in the Department. From 2012 to 2018 there were 92,239 calls that involved canine services and canines participated in 2,718 arrests where no physical apprehension took place. From 2012 to

2018 there were 142 arrests that involved a canine physical apprehension. From 2012 to 2018 canine teams provided 24 hour service 7 days a week without interruption.

The St. Paul Police Department is a nationally-recognized and award winning unit. All St. Paul police canine teams are certified by the U.S. Police Canine National Association before they are allowed to work with citizens. In 2018, for the fourth year in a row, the St. Paul canine unit was named the Top Department Team at the national trials conducted by the U.S. Police Canine National Patrol Dog Trials.<sup>1</sup>

However, recent events involving questionable deployments resulting in physical apprehensions and several accidental bites called into question the unit's operational effectiveness and safety in an urban environment. Although accidental bites occur in agencies across the nation when working with police canine teams, which are comprised of an officer and a canine, there have been increased questions about accidental bites occurring within the St. Paul Police Department.

The goal of the Bill Finney & Associates audit was to review the St. Paul Police Department canine unit's policy, practices, supervision and training to evaluate the use of police canines. The audit was commissioned to better understand the St. Paul Police Department canine unit and learn if there is more that could be done to increase the safety of unit deployments and trust of the public in the unit.

## Methodology

Bill Finney & Associates utilized a multitude of methods to gain an understanding of the St. Paul canine unit from all perspectives. These methods included:

- St. Paul Police canine case review,
  - All accidental canine bites from 2012 to 2018
  - Selected cases involving physical apprehensions by canines
- Interviews of internal and external stakeholders, including:
  - Police Department leadership,
  - Canine handlers and supervisors,
  - Past and current trainers,

---

<sup>1</sup> (<https://www.twincities.com/2017/10/05/st-paul-police-k-9-officers-dogs-nab-national-award-for-third-year/>)

- Patrol supervisors,
- All seven members of City Council,
- Key community stakeholders, including
  - St. Paul Chapter of the National Association for the Advancement of Colored People,
  - St. Paul African American Leadership Council,
  - American Indian Movement leadership,
  - St. Paul Black Ministerial Alliance
  - St. Paul Latino Community representatives,
  - The Police Civilian Internal Affairs Review Commission.
- Review of current and prior policies pertaining to the St. Paul canine unit,
- Comparison of St. Paul policies to policies used by other police departments having canine units of a similar size,
- Review of criteria for the selection of canines and prospective handlers,
- Direct observation of training and canine behavior,
- Site inspections,
- Literature Review, including the ALCU's report to the Senate Committee on Homeland Security and Governmental Affairs, *Dogs of DHS: How canine programs contribute to homeland security.*<sup>2</sup>

Bill Finney & Associates designed the audit to understand how St. Paul police canines are deployed, supervised and trained under the policies and operations in effect at the time the audit began. The audit also sought to learn how canine teams work together in operational settings. The audit solicited comments and perspectives as to whether stakeholders still supported the St. Paul canine unit in light of recent events.

The audit was conducted according to generally accepted police canine evaluation principles.

---

<sup>2</sup> <https://www.tsa.gov/news/testimony/2016/03/03/hearing-dogs-dhs-how-canine-programs-contribute-homeland-security>

## Findings and Recommendations

### Stakeholder Perspectives

There was support among external stakeholders for canine services to continue within St. Paul, including support within communities of color. In some cases, the support expressed was very high. While there was general support for the unit, stakeholders also wanted to ensure the unit was operating safely.

Overwhelmingly, stakeholders insisted that this report determine why unintentional bite injuries were occurring, insisted that corrective steps be implemented, wanted to ensure the Department had the necessary level of oversight to ensure the safety of innocent citizens, and asked for a review of the unit training curriculum, policies, handler selection, canine breed selection, and procedures and practices.

- **Recommendation:** The City and the Police Department took an important first step in commissioning this audit. The recommendations of this audit should be implemented quickly and sincerely. The City of St. Paul should invest the necessary financial resources that will improve the safety and effectiveness of the canine unit.

### Unit Policies

The St. Paul Police Department has a long-established professional canine policy. Although the policy met minimum standards, it did not serve the needs of the unit, the Police Department, or the City.

The audit compared St. Paul's canine and use-of-force policies to policies used by other law enforcement agencies and found that they were consistent in following recognized requirements for canine use of force. In the review of canine handler reports where physical force was used, it was noted that the criteria described in the policies were often used by handlers in the documentation of their use of force in official police reports.

During the course of the audit, the canine unit policy was severely restricted to only allow canine deployments in the most serious cases. Over the course of the audit, the Department made adjustments to its policy based on recommendations by Bill Finney & Associates.

- **Recommendation:** The Department should take a new look at its canine unit policy. The previously existing policy was acceptable to national standards, but the Department should consider updating the policy based on the recommendations of this report.

- **Recommendation:** The temporary restrictions, while important to maintain unit operations while this audit was pending, do not allow the unit to fully meet its mission and should also be amended based on the recommendations of this audit.
- **Recommendation:** While the Department should have strong, current, and legal policies, the unit should also develop an operating handbook that provides day to day guidance on maintenance, training, unit procedures, recordkeeping, and other unit standards. This handbook will better facilitate the unit in achieving the highest possible standards as it serves the city. The handbook should be periodically reviewed and updated by the canine unit commander.

### Canine Unit Structure

Immediately prior to the commissioning of this audit, the canine unit consisted of one supervisor and eighteen canine teams. It was difficult to accurately evaluate the supervisor's position as there was no list of duties and a general absence of paperwork or files to review. That noted, the supervisor had an apparent unmanageable workload due to the span of control and wide range of duties of the assignment. The number of supervisors assigned to the unit had reduced over time as a result of Department staffing challenges. The organizational structure was outdated and did not serve the City's needs.

After the occurrence of the incident that led to the commissioning of this audit, the Chief of Police assigned a dedicated commander to the unit. As part of this audit, Bill Finney & Associates further recommended that the Department assign an additional sergeant to supervise the unit and recommended that none of the supervisors be assigned their own canine to train and manage.

- **Recommendation:** Continue the organizational changes made immediately prior to and during this audit, to include a unit commander and appropriate sergeant supervisors.
- **Recommendation:** Add a third sergeant to the unit as a supervisor and assign one sergeant supervisor to each tour.
- **Recommendation:** Supervisors should not be assigned to handle a patrol canine as it limits their available hours for supervision.

- **Recommendation:** A list of canine unit sergeant duties and responsibilities should be organized in an operations manual to be located at the canine unit. This manual should be periodically reviewed and updated by the canine unit commander.

## Training

The training program, although meeting certification needs, was not in line with requirements of urban deployments. Training did not recognize the importance of using scenario-based training as a way to analyze canine teams and their capabilities. In short, the training program lost sight of the unit's purpose and canine training requirements for operational work in favor of certification standards.

The training program design, consisting of a head trainer and supplemental trainers divided into four training groups, did not facilitate consistent training workloads and schedules. Due to this structure, the audit revealed that handlers trained themselves 66% of the time. While it is acceptable for canine handlers to train themselves, it is not acceptable for handlers to do the majority of their own maintenance training. The audit revealed that handlers were often left to score their own training performance as opposed to being observed and scored by unit trainers. Without consistent trainer oversight, there were missed opportunities to correct miscues and mistakes.

Additionally, during the audit it was observed that the unit was attempting to adopt what is called the "Winnipeg" tracking philosophy. This technique requires the canine team to move very fast, at a faster than walking speed. It was observed that this technique had mixed results for locating items at this time.

- **Recommendation:** The unit should establish a training manual. It should contain a list of canine unit training duties and responsibilities should be organized in a training manual to be located at the canine unit. This manual should be periodically reviewed and updated by the canine unit commander.
- **Recommendation:** The unit should identify that the head trainer's first responsibility is to train the trainers to deliver effective and up-to-date canine practices and procedures to canine teams.
- **Recommendation:** When training canine teams, the priority of "citizen safety first" should always be emphasized. All training should be based on the principle that canine teams exist to serve citizens.
- **Recommendation:** All training should be scored and accurately recorded within the unit by a dedicated supervisor.

- **Recommendation:** The unit should better balance training for the needs of both certification and operational deployments.
- **Recommendations:** All phases of training for the new canine class and tracking skills should be periodically reviewed.
- **Recommendation:** Training should always emphasize the canine's primary purpose as a locating tool.
- **Recommendation:** The Department should identify a standard tracking technique and achieve certification in that technique as soon as possible.
- **Recommendation:** Trainers need to train canine teams during their shifts to accurately see teams performing in the work environment. Trainers should retrain themselves during their shifts also without the responsibility of taking calls when staffing allows.
- **Recommendation:** Canine handlers should note and log any training they do when a trainer is not present. Trainers should regularly read these training logs for possible follow up. When a trainer is present, they should always record how the training went along with any recommendations. All training activities should be recorded in a central recordkeeping database.
- **Recommendation:** Current and annual certifications should continue. Annual tracking certification should be added as soon as possible.
- **Recommendation:** Handlers should participate in sixteen hours of monthly training to enhance techniques to prepare themselves and their canine partner for future operational deployments.
- **Recommendation:** Trainers should observe new canine teams guiding them through training scenarios and reporting back to the head trainer any issues with team operational readiness.
- **Recommendation:** Training programming should be certified by an independent evaluator.

### **Recordkeeping**

The unit did not keep adequate records of training, canine transfers, deployment history, and incidents where there was a use of force. The unit did not keep consistent records of when canine teams were deployed and the results of those deployments, to include times when canines were used to detect, locate or



apprehend. In attempting to examine the recordkeeping system, the audit found that the system used by the canine unit was old, obsolete, and essentially non-functioning.

- **Recommendation:** The City should invest in adequate recordkeeping systems and establish specific recordkeeping procedures. Unit recordkeeping systems should be capable, at a minimum, of accurately recording basic unit information:
  - All training, to include training type, time, and performance,
  - Deployments by type (location, track, apprehension),
  - The outcome of each deployment,
  - Canine health and maintenance records

### Canine Team Selection

Canine selection produced good dog prospects for the basic canine course; however, more attention is required to properly match individual dogs to handlers. Additionally, officers previously assigned to be canine handlers may not have been physically suited for specialized work as part of a canine team.

- **Recommendation:** The canine unit should develop a list of criteria for new dog selection. There should be significant supervisor oversight of the selection and acquisition of all new canines to the unit.
- **Recommendation:** The unit should have pre-established written considerations for selecting canine handlers that are specific to canine teams, rather than general department needs.
- **Recommendation:** The unit should prioritize matching canines and handlers to create safe and effective canine teams.

### Canine Team Equipment

The audit included site visits, interviews and equipment inspections. Through these inspections, the audit found that there were equipment inconsistencies among the teams, in part because important equipment was being purchased by individual handlers, sometimes using their own funds. Additionally, as equipment failed, handlers were oftentimes required to replace equipment at their own cost. The required equipment was not part of the unit's annual budget and therefore handlers would solve their own equipment needs.

- **Recommendation:** The Department should standardize its training and deployment equipment and issue only approved equipment to its handlers. Handlers should be restricted from utilizing non-approved equipment.
- **Recommendation:** The City of St. Paul should properly fund all required equipment for proper outfitting of canine teams.

### Unit Property

The unit is housed off-site at a kennel location in Maplewood, Minnesota. Because of its location, the unit is responsible to maintain all necessary property and equipment for its functions. The audit revealed that the unit did not have adequate systems for securing unit property on the site.

- **Recommendation:** Policies and procedures should be put in place to regulate facility security and to safeguard unit property.

### Canine Deployments

The St. Paul canine unit deploys as a specialty unit in support of patrol operations. Canine handlers are supervised by canine sergeants and exercise independent judgment about canine deployments. Canine teams are expected to exercise a high-level of critical thinking and decision making during canine operations.

The audit found that canine teams did not always distinguish between the missions of tracking and apprehending. The audit found that the primary use of canine teams had historically been as a locating tool. However, review of earlier cases showed that at some point in time, tracking deployments were frequently followed by a physical apprehension when a suspect was located. As a result, the decision to use the canine team as a force option appeared to be made at the time of deployment.

- **Recommendation:** Department policies should clearly distinguish the functions of locating, tracking and apprehending in its training and procedures for the canine unit.
- **Recommendation:** The most critical training a canine handler can receive is learning proper deployment decision making based on information known at the time as well as the ability to adapt their tactics as circumstances change. Canine deployments should follow a pre-determined checklist to determine objectively reasonable force according to the Department's policies.
- **Recommendation:** The department should develop more arrest options for officers that could be used prior to physical apprehension by a canine.

- **Recommendation:** The department should incorporate its practice of using time, distance, cover, and options to slow encounters during canine unit operations.
- **Recommendation:** When canine teams are deployed, they should not be limited to the length of leashes used or other restrictions. Deployment strategy should determine the equipment needed. Proper training teaches handlers correct deployment strategy and the proper selection of canine deployment equipment. Bill Finney & Associates recommends that more discussions are held between the canine unit and police administration to determine the criteria necessary to search buildings, open areas, tracking, and fleeing suspects.
- **Recommendation:** Add policy language: “The decision to deploy the canine team in a specific police operation is the responsibility of the canine handler. The canine handler will have the final decision making authority whether and how to deploy their canine.”

### Warnings

The audit examined through its case review the practice of canine teams in giving warnings. When using canines as a force option, canine warnings must be given and there may be several different scenarios where a canine team should give warnings. The Department canine unit policy clearly establishes a requirement for “announcement and opportunity for peaceful resolution”. Despite the clear requirement in policy, the audit found that there were inconsistencies in the frequency and in the actual announcement of warnings during deployments. These inconsistencies were also noted in recent cases involving accidental canine bites and were potential causal factors.

- **Recommendations:** The Department should enforce standard warning requirements. In addition, the Department should add guidelines that better describe how often warnings should be given.
- **Recommendation:** The Department should mandate that warnings be given on each floor during a building search, when the environment changes, or when it is felt that the team has moved to an area where the previous warning may not have been heard.
- **Recommendation:** During deployment, in observing a canine’s change of behavior alerting the possible presence of a suspect or another human odor, additional warnings should be given unless an imminent danger is present.

## Conclusion

The recent accidental bites can be attributed in part to inadequacies within the canine unit connected to outdated training practices, organizational structure, and a lack of understanding of trends and inadequacies due to a non-functioning recordkeeping system. Additionally, protocols related to tracking and canine handling in a crowded urban environment were not adequately understood and practiced.

The audit found that the practices addressed in this report occurred over many years and across several training program coordinators. Additionally, as the St. Paul Police Department has evolved and adopted more progressive professional standards, the canine unit standards have not kept pace with the Department. The introduction of body worn cameras was a factor in identifying these patterns. The commissioning of the audit and a commitment to implementing the recommendations contained in this report are important steps to bringing the canine unit up the general standards of the St. Paul Police Department.

Bill Finney & Associates, LLC strongly recommends the city and the Department adopt the recommendations of this report.

## Appendix - Selected Portions of an Operations Manual

### Canine Sergeant Essential Job Functions

The following describes the essential job functions of a canine unit sergeant:

- Supervision of canine handler response to incidents/calls

- Review/approval of all canine deployments
- Daily scheduling of canine handler and schedule change requests
- Scheduling of unit training dates
- Coordinate membership for canine handlers in the United States Police Canine Association
- Scheduling of United States Police Canine Association certification events
- Scheduling of SPPD Academy canine cover officer training
- Scheduling of PDI Canine Cover Officer Class
- Scheduling of PDI Basic Canine Patrol School
- Scheduling of PDI Detector School
- Secure training venues and obtain permissions for use/contracts
- Be present at all canine handler training events off-site from a police facility
- Oversee unit training plans with lead canine trainer
- Oversee canine SWAT teams, including training and evaluation
- Review monthly canine training logs and trainer evaluations
- Coordinate individual training plans with lead canine trainer
- Review BWC videos for canine deployments
- Conduct weekly BWC audits/reviews for all handlers
- Liaison with the SPPD K9 Foundation and attend board meetings
- Oversee veterinary plans and appointments for all canine teams
- Complete monthly canine unit report
- Complete yearly NAACP report
- Ensure that quarterly Taser uploads are complete
- Inventory and update patrol equipment
- Inventory and acquire training aids (explosives, narcotics)

- Coordinate and schedule canine building and grounds maintenance
- Complete personnel evaluations
- Schedule canine demonstrations and emcee at large demonstrations
- Complete canine unit data requests
- Complete speed reviews for canine unit personnel
- Investigate allegations of misconduct for canine unit personnel
- Investigate BWC policy violations of canine unit personnel
- Manage fleet inventory
- Oversee canine acquisitions
- Provide/coordinate department in-service training updates
- Communicate policy and procedures to canine handlers
- Approve Packetwriter reports for canine handlers
- Maintain personnel and training records for canine handlers
- Complete reports for injuries sustained on-duty by canine handlers
- Participate in the interview and selection of new canine handlers

#### **Duties and Responsibilities of Canine Unit Trainers**

The following describes the essential job recordkeeping responsibilities of a canine unit trainer:

- Examples of information needed on a training log for a Patrol Canine:
  - Date
  - Time
  - Weather conditions
  - What is being trained (tracking, building search, etc.)
  - Information about the training, length of the track, how many floors searched, etc.
  - What the exercise was intended to accomplish

- What type of reward was administered (Kong, tug or ball)
  - Training aids used
  - Rating system
  - Comments
- 
- Examples of information needed on a training log for Detector Canine
    - Date
    - Time
    - Location
    - Length of training
    - Weather conditions
    - Type and amount of drugs or explosives used
    - Number of training aids used
    - Location where the substance was hidden
    - What the exercise was intending to accomplish
    - Whether the substances were found
    - Proofing the canine, using PVC, bland vehicles, uncirculated money, plastic bags, rubber bands, cloth or gloves
    - Masking agents
    - Container
    - Rating system
    - Comments

### **Canine Handlers**

The following describes the essential duties and responsibilities of canine handlers:

- The canine handler is responsible for the care of their canine. This includes annual medical examinations and daily checks of their canine.

- The canine handler is responsible for the care and upkeep of all issued equipment for canine training and deployments.
- The canine handler should complete all appropriate forms when a canine is deployed and notify the canine supervisor of any physical contact by their canine.
- Canine handlers are required to report any deployment or training issues with their canine to the canine trainer.
- Canine handlers are responsible for completing all mandatory monthly canine training.

## Canine Care

1. Police canines shall not be used for breeding, participation in shows, field trials, exhibitions, or other demonstrations or on- or off-duty employment unless authorized by the canine sergeant.
2. Officers shall maintain their canines both on- and off-duty in a safe and controlled manner.
3. Canine handlers are personally responsible for the daily care and overall welfare of their animal to include:
  - a. Maintenance and cleaning of the kennel and yard area where the canine is housed.
  - b. Provision of food, water and general diet maintenance as prescribed by the Department's authorized veterinarian.
  - c. Grooming daily or more often as required by weather, working conditions, and other factors.
  - d. Daily exercise.
  - e. General medical attention and maintenance.
4. Canine handlers shall immediately notify the canine supervisor of any changes that would affect the care and housing conditions of their dogs.
5. Handlers shall not permit anyone to pet or hug the canine without the handler's prior permission and supervision.
6. A canine handler may apply to take possession of the dog when:



- a. The dog is retired from duty or relieved from duty due to injury.
- b. The handler is transferred, promoted, or retires, and the decision is made not to retrain the dog for another handler.

### **Canine Selection**

When acquiring a new canine for police work, there are many things to consider relating to the dog's behavior, medical soundness, personality, physical stature and the dog's ability to contain its excitement through the transition.

### **Canine Handler Selection**

- Enough patrol experience with satisfactory work performance.
- Willingness to remain with the unit for an extended period.
- A willingness and ability, together with other family members to house the canine at the officer's residence safely and securely and with adequate provisions and facilities to properly care for the health and well-being of the canine by departmental requirements.
- The ability to perform essential job-related functions related to fitness and agility.
- Be able to work with minimal supervision and be trusted to do so.
- Have a good work ethic and be able to be counted on to complete tasks.
- Be able to handle stressful situations and be able to think quickly under pressure.
- Be a good communicator and have good public-speaking skills.
- Use good judgment and consider the potential consequences of decisions and actions.
- Be able to understand the working dog and be dog-oriented.
- Be a continual learners and take constructive criticism well.
- Be able to maintain and keep up to date a training log.

### **Canine Team Equipment**

Each canine handler will be issued the following equipment and will be responsible for the care and maintenance of this equipment:

- Electronic E-Collar
- Belgian Sleeve #3
- Hidden Sleeve
- Soft Muzzle
- Agitation Muzzle
- Magnet Ball Set
- Two Black Kong Balls
- Training Vest
- Choke Collar
- Pinch Collar
- Agitation Collar
- Six-foot leash
- Fifteen-foot Leash
- Traffic Leash
- Undercoat Rake
- Feed Pan
- Small and Large Tug
- Dominant Dog Collar
- Bite Pillow
- Flexi Lead