Field Training and Its Necessity in Law Enforcement

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Abstract

This research paper explores field training and the two primary field training program models that are utilized by various departments, focusing on the police departments in the United States. Field training has been a useful training tool for police departments, both large and small, and continues to benefit the officers and agencies that use it properly. Case law explains how departments that do not have an adequate field training program have an increase in officer negligence and a poor quality of police services. Field Training helps to reduce civil liability incidents, complaints, and increases the overall ability and confidence of the police officers who go through either of the two main programs, the San Jose Model or the Reno Model. Field training programs can help departments cultivate leadership skills for younger officers, and a strong program can help those same officers develop the necessary communication skills to be better leaders as they move up in their respective departments. Despite having a college requirement in some agencies, the field training requirements are still lacking. A proper method of selecting field training officers is an important first step and selection can be based upon the interest of the officer, the past performance, and recommendations from supervisors. M L Bromley with the National Institute of Justice writes that the “selection of your field trainers can make a good Field Training Program become more” (Bromley 1982). A proper selection of Field Trainers can directly impact a program in a positive or negative way, depending on who was chosen.
Field Training and Its Necessity in Law Enforcement

Field training programs are designed to help a recruit officer develop the necessary skills to perform the job duties required by their employer. Field training programs are also utilized to determine if a recruit officer is capable through daily evaluations covering multiple scientific behavioral categories. The creation of Field Training was based upon incidents involving the poor training offered by departments in the past. Field training has been shown to improve officer ability and competency at a faster rate than those that do not go through a field training program. Field training program research shows that a new officer who does not go through a field training program usually will finally obtain the experience needed around two years into doing the job. This training is inadequate when compared to a new officer who goes through a twelve to sixteen week field training program. When the recruit graduates from the program, he or she has received the experience necessary to do the job. An article from *The Rockford Register Star* speaks on methods to increase the quality of training. One option the writer, Scott Reeder, mentions is making “field training officer positions prestigious, well-paid assignments that only the highest performers qualify for” (Reeder 2020). Field trainers are tasked with the responsibility of being in charge of their own actions and the actions of a probationary officer. According to James A. Conser, Rebecca Paynich, and Terry Gingerich, patrol officers are the “eyes and ears and the backbone of all municipal, county, and state policing organizations” (Conser et al 2013). The importance of patrol makes the training that much more important. There are currently two primary models of Field Training Programs being utilized in the United States. The first, and oldest model, is the San Jose Model. The San Jose Model was created in 1972 by members of the San Jose Police Department as a response to critical incidents involving an officer with the San Jose Police Department, which is located in San Jose, California. One
officer had a severe vehicle accident, and it was determined to be based on a lack of training. At
the time, training sometimes simply consisted of two weeks of riding time with a training officer
and then the employer giving the officer keys and equipment and letting the new officer perform
solo patrol duties. The result was often that the officer would not feel confident performing the
job duties and would usually take, on average, two years to become competent at the job. San
Jose Police Department Lieutenant, Robert L. Allen, who had prior experience in the military
and teaching at the California Military Academy, designed a program for evaluating
probationary officers. His program was sent to the command staff, and a deputy chief did not
allow it to be seen by the chief of police at that time. In September of 1971, there was an incident
that ended with the shooting of a motorist on a traffic stop. This incident made the public begin
to question the training of the San Jose Police Department’s officers. The chief of the San Jose
Police Department, Robert Murphy, began to explore ways to combat the training deficiencies.
The San Jose Police Department hired a psychiatrist named Dr. Michael D. Roberts as the
Director of Psychological Services to help develop the program. The collective group formed the
program based off of behavioral anchors noticed among police officers as the most important
attributes that help form a well-balanced police officer. During this time frame, the thought
process, according to Michael S. McCampbell was to “institute field training programs as a
natural extension of their recruit selection and training process” (McCampbell 1987). The focus
on training based on daily evaluations, which resulted in quite a bit of documentation,
paperwork, and extra work, led to the design of other programs by other people who believed
training was important.

The Reno Model was developed when Chief Jerry Hoover acquired federal funding and
was able to form a team consisting of training experts to create a post-Academy training
program. The Reno Model stressed the importance of police officers having problem-solving skills and focused more on the adult learning methods to create a better, and more positive, experience for the trainee and trainer. The Reno Model is commonly associated with the Community-Oriented Policing and Problem Solving program (COPPS) and is structured to develop a more community oriented police officer during their recruit status and training. The Reno Model focuses on problem solving and the identification of problems to lead to a more proactive approach to issues within the communities it is utilized in to better serve the citizens of that respective community. The field training officers that are usually labeled through the San Jose Model are instead called Police Training Officer, abbreviated PTO and typically

**The San Jose Model**

The San Jose Model is structured around daily feedback between a field training officer (FTO) and a probationary officer (PO). According to McCampbell in his article on Field Training, the San Jose Model introduced the first “formalized field training program” (McCampbell 1987). In most agencies that use a San Jose Model, there are field training officers, field training managers, and a field training coordinator. Field training managers will typically be in charge of the field training officers and will review the daily observation reports that come in throughout a week. The field training managers will ensure they are compiled into a weekly manager’s report, or WMR, and the field training coordinator will review the manager’s work and compile the weekly report to a phase summary report, or PSR. The probationary officer is evaluated on twenty five to twenty eight categories for four phases, with a fifth phase being a final probationary period. The categories from the daily observation report, which is commonly abbreviated DOR (See Appendix A), are normally separated into categories that include: critical performance tasks, frequent performance tasks, knowledge, relationships/attitudes, and
appearance. The critical performance tasks typically focus on officer stress control, both verbal and behavioral, decision making, driving skill in emergency situations, field performance under both stress or non-stress conditions, officer safety when in the contact role, or primary officer, the cover role, or support officer, and when patting down suspects for weapons. It also includes location/orientation, or being able to respond to the call promptly with little or no guidance, self-initiated field activity, tactics used during a traffic or pedestrian stop, and interview/interrogation skills. These are considered to be critical performance tasks because they all include a skill that must be at an acceptable level to become a quality officer. The frequently performed tasks are normal driving skills, the probationary officer’s use of the radio, and report writing. The knowledge portion of the daily observation report includes an understanding of departmental policies and procedures, criminal code, motor vehicle code, and common patrol procedures. The relationships/attitudes section scores the probationary officers’ acceptance of criticism and feedback, both verbally and by their behavior, their attitude toward police work, their behavior toward citizens, and their relationships with department members. Finally, the last category typically grades the probationary officers on their general appearance. On the daily observation report, the field training officer is able to document if any of the categories are not observed, or NO, as well as any additional training time, also known as remedial training, that the probationary officer needs. The additional training is documented due to issues that may have taken place on a certain incident that the probationary officer responded to with the field training officer. Another field that the field training officer might have to use is the not responding to training, or NRT, field. The not responding to training field is used when a probationary officer has been taught a certain skill several times, and they do not respond to the training plan
provided by the field training officer. Typically, the field training officer manager will step in and develop a new plan when he or she sees this on a daily observation report.

**Phases in the San Jose Model**

The phases are normally three to four weeks long and can have a one or two week extension for probationary officers who struggle with passing specific categories on the daily observation report. A field training manager will normally develop a plan if a probationary officer is failing during any of the phases. The phases are broken up by a workload ratio between the probationary officer and the field training officer. The probationary officer begins in an administrative phase, which usually entails being fitted for a uniform, gaining access to the systems they will be using for work, and generally other tasks that do not require being on the street for patrol. The next phase is called the academy phase. The academy phase is specific to the probationary officer’s time at whichever police academy is required by the department they are with. Once the probationary officer is done with the police academy, they begin a one week observation phase. In the observation phase, the probationary officer rides with a field training officer and becomes acclimated to the city they will be patrolling. Once the probationary officer is done with the observation phase, he or she will begin phase one. Throughout all of the phases in the program, the recruit will be evaluated on all categories.

**Standardized Evaluation Guidelines and Scoring for the San Jose Model**

The grades are based upon the standard evaluation guidelines, or SEG, which have the categories thoroughly explained for failing or passing. The standard evaluation guidelines can range in scores between a one to five scale or a one to seven scale. In the one to five scale, a one or two is a failing score, while a three or four is acceptable. A five on this scale is considered superior. Any scores given that are a one or a five require the field training officer to write the
reason behind the score. The seven point scale will normally have a score of a four, five, six, or seven as a passing score, and anything below a four as a failing score. A newer approach to the San Jose Model is the addition of task reference numbers, abbreviated as TRN. Task reference numbers can add an easy way to explain why a score is given. For example, a score rated at a three or four is an acceptable score and does not require a written explanation, but the task reference number can be utilized to more thoroughly document performance. It is difficult, months or even years later, to ascertain why the score of a three or four was given at the time of the probationary officer’s period of field training. The task reference number is coordinated with a specific sentence in the standardized evaluation guidelines to explain a score in more detail. The task reference number can be used for passing or failing scores. A five point scale is useful because it allows a two and a four to be more opinion based from the field training officer, compared to a three point scale in which one is a fail, two is acceptable and three is superior.

The Reno Model

The Reno Model of field training is typically used for a more community oriented approach to policing. It was designed due to the belief that traditional field training programs focus on the behavior of the recruit more than the actual training of how to handle problems associated with calls. Cindy Pruitt with the Alamo Heights Police Department writes that “the Reno Model Police Training Officer (PTO) program is a new and innovative type of field training program that addresses leadership development at the earliest stages of an officer's career” (Pruitt 2010). According to the Reno Police Department’s police training officer manual, the objectives of the program are to formulate learning opportunities for new officers that meet or exceed the training needs of both the community and policing agency, to develop and enhance the trainee’s learning from the academy within the community environment through a series of
real-life problem focused activities. The program is also meant to foster a growing independence from the police training officer over the course of the program, to produce graduates of the training program who are capable of providing responsible, community focused police services, and to prepare trainees to use a problem-solving approach throughout their careers by employing problem-based learning training. James Walker, Ph. D, writes “another important concern with the San Jose Model revolves around its significant focus on legal issues, in particular liability and termination” and says that it has “excessive concerns with documentation” (Walker 2005). In the Reno Model, police training officers will assign problems to the probationary officers and have them learn how to police by solving the assigned problem. The Reno Model uses a learning matrix that typically consists of four phases labeled as phase A, phase B, phase C, and phase D according to the Reno Police Department’s PTO manual (Reno Police Department 2021).

**Length and Phases in the Reno Model**

The Police Training Officer program has two primary areas of training: substantive topics and core competencies. The recommended length of the Police Training Officer program is fifteen consecutive weeks, which entails one week of integration, twelve weeks of training, and two weeks of evaluation. The agency may wish to alter the length of the program to customize it for the local needs. Before the trainees enter into the Police Training Officer program, they will need instruction in Community-Oriented Policing and Problem Solving (COPPS). The instruction for this portion of training may take place at the academy or internally at the agency, prior to training. The phases are labeled as letters A, B, C, and D. Phase A is based on problems for non-emergency situations and is considered to be the initial training and learning experience for the trainee. It typically will last for three weeks. Phase B is the second training and learning experience. It also lasts for around three weeks and covers problems involving emergency
situations. Phase C is the third training experience and also lasts for three weeks. The substantive
topic in this phase is patrol activities. Phase D is the final phase of the training and learning for
the trainee. The duration of it is three weeks, and its primary topic is criminal investigation. The
trainee will then be on solo assignment and is considered to be a solo patrol officer. Although the
officer is considered to be on solo duty, the trainers can still decide to give more problem based
learning activities.

Civil Liability and Field Training

Most field training models were formed due to incidents that exposed the department and
officer to a lawsuit due to poor or inadequate training. Field training officers can potentially risk
being sued themselves and are responsible for everything that they teach the probationary
officers. They are responsible for the officers they teach for the rest of the officers’ career.
Failure to train lawsuits are commonly associated with field training and, not only are the field
training officers held liable, the department also can be. In most lawsuits against police officers,
the lawsuit includes the city, county, or state that the department is based out of, and the upper
administration of the department. Failure to train and failure to supervise lawsuits commonly
include veterans of the police force at the agency because they are normally the ones in charge of
training and supervising after being at their departments for extended periods of time. Typically,
the further a person advances in a department, the greater responsibility that person will have.

Nancy Fadhl v. City/County of San Francisco

Another liability that comes with field training programs is being sued for unfair
treatment or hostile work environments. A landmark field training case is Nancy Fadhl vs. City
and County of San Francisco. It was heard in the United States Court of Appeals, Ninth Circuit,
and was decided on August 29, 1984. Fadhl brought the lawsuit based upon gender
discrimination. The lawsuit began on August 13, 1979, when Nancy Fadhl filed against the police department of the city and the County San Francisco with the claim that a provision of the Civil Rights Act of 1964 was violated. The lawsuit demonstrates that Nancy Fadhl had been preparing to become a police officer prior to her employment by how she obtained an Associate’s degree in criminology. She completed the police academy portion of training, satisfactorily, in the 130th class of recruits. She was one of two females in the class of forty nine students. In 1978, the Field Training Program that the city offered was a fourteen week program, which all recruits must pass to be retained as solo officers. The city utilized thirty performance categories, and the recruit was trained and evaluated by training officers and sergeants. The grading scale was based off of a one through seven score, with a grade of four being the minimum level of an acceptable score. The department did a standard San Jose Model of Field Training by utilizing a daily observation report and standard evaluation guidelines. While Fadhl was in the Field Training Officer program, she rotated through regularly assigned field training officers and field training sergeants. From the eighth training day to the twenty-eighth day, she was assigned with Officer Harlan Wilson and Sergeant Philip Dunnigan. She would then switch to Officer Mike McNeill and Sergeant Robert from the twenty-ninth day to the fifty-sixth day. On the fifty-seventh day she was assigned to be with Officer James Hall and Sergeant David Dugger. There were no female field training officers at the time of Nancy Fadhl’s training. During the sixty-ninth day of the field training program, she was taken off of field duty and placed at the station due to “unsatisfactory field performance”. She was subsequently terminated on October 20, 1978. The focus point of her lawsuit against the department was that she would receive mixed messages when it came to the scoring based on the standard evaluation guidelines and the field training officers’ narrative. One example of such an occurrence is when Nancy
Fadhl received all fours, which scores as the minimum standard, but the field training officer’s narrative that day would say that she performed “flawless” work. The testimonies of the field training officers were also inconsistent with how she was scored at the time, and there were several occurrences of the field training officers making statements and claims that did not mirror the standard evaluation guidelines that they were supposed to adhere to. The field training officers demonstrated a pattern of adverse and discriminatory behavior towards Nancy Fadhl compared to the male recruit officers. The pattern displayed by the male field training officers showed that male officers, when graded on the same types of behavior, had similarly worded narratives, while they gave Nancy Fadhl “less favorable evaluations for similar or superior performance” (Fadhl v. City of San Francisco 1984). When the trial began and officers testified, their testimonies would often include details that had not been documented. One of the Field training officers, Harlan Wilson, testified that Nancy Fadhl was “too much like a woman,” which led the court to infer that there was a bias insinuating that for one to be a good officer, one cannot be a female. Another field trainer, Sergeant Dunnigan, testified that “after work, she can become feminine again” (Fadhl v. City of San Francisco 1984). Field training officer McNeil described Nancy Fadhl as being “very ladylike at all times which in the future might cause problems” (Fadhl v. City of San Francisco 1984). One of the counter arguments to Nancy Fadhl’s case was when other female officers testified that they did not have the same issues that Nancy Fadhl had, even with the same training officers. The trial concluded by ruling in favor of Nancy Fadhl, and she was ordered to receive money in the amount of wages she had lost by being terminated. The lesson learned for all field training officers and anyone in charge of the programs was that departments must properly document poor performance, and documentation must reflect the scores received. An example was one of the field training officers recording that
her performance was superior but giving her a score that is equivalent to the bare minimum accepted. The lack of documentation is what ultimately lost the case for the city and county of San Francisco.

**Davis v. Mason County**

Another landmark case for field training is one that involves excessive force complaints against Mason County. The case was ultimately heard in the 9th circuit court of appeals and involved several co-defendants. All of the defendants claimed excessive force complaints against various Mason County Sheriff’s deputies. Each of the complaints came from traffic stops that had been conducted, which ended in the plaintiffs being beaten, arrested, and charged with false charges, which were later dropped. All of the incidents took place within a span of nine months between June of 1985 and March of 1986. The first incident happened early in the morning hours on June 29, 1985. The plaintiff, Doug Durbin, left a local tavern and went home. Deputy Ray Sowers with the Mason County Sheriff’s Office followed him home and, after another deputy arrived, began flicking a stun gun on and off, commanding Durbin to come out of his home. Durbin came outside and was arrested for drunk driving. The account is that Durbin took one step toward his home, and the two deputies then tackled Durbin and threw him on the ground. It was documented that Durbin did not resist but was still beaten on the back of his head by Deputy Sowers’s fist. After Durbin was placed into a patrol car, he was transported to the jail. While they were heading to the jail, Deputy Sowers slammed on his brakes and caused Durbin, who was handcuffed and considered defenseless by the court, to slam against the screen with his face. The second incident involves Don Taylor, who was alleged to have been driving too fast on the afternoon of July 20, 1985. Deputy Doug Quantz pulled Don Taylor over and ordered him to spread-eagle against Quantz’s patrol vehicle so he could be patted down for weapons. While he
was doing the pat down, Deputy Quantz twisted the skin on Taylor’s legs and arms, struck him on the sides, hit him in his testicles, and then slammed him against the patrol car’s side. While they were in the jail, at a later time, Quantz then hit Taylor with his fists in the kidneys. The agency had Taylor sign a covenant not to sue, and they dropped his charges. The Davis incident, which named the plaintiff side of the lawsuit, involved John Davis and his fifteen year old nephew, Wayne Broughton. On the afternoon of July 28, 1985, Davis and Broughton were operating a loaded hay wagon with four horses pulling it. Since traffic was slowed down behind the wagon, Deputy Jack Gardner pulled up beside the wagon and used his loudspeaker to order Davis to pull the wagon over. The loudspeaker caused the horses to spook, and Davis lost control. Gardner pulled in front of the wagon and drew his weapon on Davis and Broughton, threatening to shoot them if they did not stop. Once Davis stopped, he began to descend from the wagon and Deputy Gardner began to beat him on the legs with his baton, striking him on the head. Two other deputies arrived, and they also began to beat Davis. A witness testified that, after the beating, Davis “looked like he had been dipped in a bucket of blood” (Davis v. Mason County, 1991). Deputy Gardner’s wife, who was not a certified law enforcement officer, took Davis by the arm and then placed him into the back of the patrol vehicle. Davis was arrested and subsequently charged with a felony assault, obstructing an officer, and resisting arrest. After the misdemeanor charges were dismissed, a jury found that Davis was acting in self-defense and acquitted him of the felony offense. The final incident occurred on March 15, 1986, and involved Deputy Ray Sowers again. Deputy Sowers observed four people talking in between a truck and car and ordered a passenger in the truck, Ed Rodius, into the patrol car after they had asked why they had been stopped. Rodius refused to comply with the order, and Sowers jumped on him, choked him, and pulled him by his hair, threw him to the ground and rubbed his face on the
gravel of the parking lot. Rodius was tried by a jury, and the first verdict resulted in a hung jury, and the second was deemed to be a mistrial. The charge was eventually dismissed by the Mason County Prosecuting Attorney. The primary aspect of this case as it pertains to field training and those that participate in field training and the supervisory roles at various agencies, is training. The ninth circuit court of appeals ruled that departments, whether located in city, county, or state, have a duty to train their employees properly and can then be held liable for what they train as well. The Mason County police department was found to have a training program for post-academy training, but it was never followed and the court learned that two field training officers, who both quit the department, said that the program was “a joke” (Davis v. Mason County, 1991). They believed that the training program should have followed more of a San Jose model of field training and include tests, reports, and reviews by the field training officers. The department did not have any proof of the training that had been done and no evidence of it ever being done. The program was supposed to last twelve months; however, it only lasted for a small amount of time. The court also noted that Sowers had not even been to the academy but was allowed to do solo patrol duties with minimal guidance. In conclusion, a jury found that Mason County, the sheriff, and deputies were all liable under 42 U.S.C. § 1983, an amendment that involves action being taken civilly against an officer who was acting in their judicial capacity.

**How do Field Training Programs Protect a Department?**

The landmark cases that were previously mentioned further demonstrate that properly documenting the training of new officers is imperative to protect the people training them and also the entire department, and governmental entity that they are derived from. Proper documentation in the law enforcement profession is something taught from day one of being a police officer. The phrase “if you didn’t write it down, it didn’t happen” is a commonly used one
that most likely all law enforcement officers are familiar with, whether from a bad experience or being told by someone who had a bad experience. The experiences could have been in court where a case was lost, or from a supervisor who did not properly document an important event that happened. Properly documenting any incident is necessary because any call for service could generate a civil complaint or lawsuit. If the officer did not properly document what occurred, the testimony could be invalid at a later time. The documentation of poorly performing rookie officers is critical in the field training process. Negligent retention of an employee is an issue that is commonly associated with a lack of proper documentation. When it occurs in field training, it is associated with a field training program and a probationary officer who is not performing adequately. Negligent retention in a source of civil lawsuits in which the plaintiff proves that the department had prior issues with an employee and failed to act to remove them or fix the problem. Failure to supervise and negligent retention are closely associated with each other as they both also apply to any supervisor’s role in police departments. A failure to document poor performance, critical issues, or insubordination can ultimately make the department and its administration liable for what that specific officer does wrong. If the officer is sued for being negligent on the job, it is common that the supervisors and city, county, or state government may also be sued. If the plaintiff proves that the supervisors were responsible in any way, they will also be liable. Proper documentation and follow through on poor performing employees can protect the agency and its supervisory staff from being held liable. If a supervisor has adequately handled an issue that will be shown in a court setting and the supervisor may receive summary judgment, which can be explained as a judgment entered by the court in favor of someone without a trial having to take place. If a supervisor maintains their own integrity and follows proper protocol, they could possibly avoid being in a lawsuit altogether.
Conclusion

Having a field training program in place is an important tool to protect the agency and its officers, specifically the supervisors on the front lines and the field training officers. Courts have ruled in favor of departments that have a structured field training program, and the San Jose Model is noteworthy because it has never been defeated in court as an improper way to train new officers. As seen in the landmark field training cases, it is essential to have a field training program and also implement it correctly. The structure of the program is crucial in this regard, so that there can be a checks and balances system at work. In the San Jose model, it is instrumental to have a chain of command, or dual chain of command, that is separate from the primary chain of command at the agency it is being used. In the Reno Model of field training, the citizens are the ultimate authority as they are the part of the community that the focus is on when dealing with problem-based learning. Having a field training program that is being utilized correctly can help probationary officers and boost their confidence to do their job. Research has shown that new officers usually acquire the necessary knowledge to be adequate police officers more quickly with a structured field training program, when compared to new officers that have a period that is completed below a recommended minimum time. The two different models were designed by police officers with the future of law enforcement in mind. These examples of departments taking the steps necessary to protect their front line supervisors exemplify how responsible supervisors need to conduct themselves. According to Donald and James Kirkpatrick, “if programs are going to be effective, they must meet the needs of participants” (Kirkpatrick and Kirkpatrick 2006). Some of the steps that Kirkpatrick and Kirkpatrick mention involve asking the trainees in the program what they need to do to make it better. Also, asking the bosses of those participating their input, and the input of others who are familiar with the job.
Lastly, test and analyze those who are in the program. Documentation of poorly performing recruits is a key in both of these programs and the follow through to terminate when necessary is pivotal in not only field training programs, but throughout all of law enforcement administration. Field training officers are supervisors, and field training helps build supervisor skills that build as an officer moves up in the ranks. While officers are field trainers, according to an article written by Ivan Y. Sun, “FTOs are more critical of their immediate supervisors and district managers than non-FTOs,” and he goes on to speak about how the field trainers and those of equal rank typically feel the same (Sun 2002). There are many situations where a lack of communication can cause a rift between an administration and the people that work under them. It is important that there be transparency, when allowed, and communication remain open between all employees to provide a better work environment and a higher morale.
# Appendix A

## Searcy Police Department - FTO Program

### Daily Observation Report

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<tr>
<th>Critical Performance Tasks</th>
<th>TE</th>
<th>TRN</th>
<th>Rating</th>
<th>NO</th>
<th>NRT</th>
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<tbody>
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<td>1. Stress Control: Verbal/Behavioral</td>
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<td>2. Decision Making: Problem Solving</td>
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<td>3. Driving Skill: Moderate/Emergency</td>
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<td>4. Field Performance: Non-Stress Condition</td>
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<td>5. Field Performance: Stress Condition</td>
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<td>6. Officer Safety: Contact/Cover/Pat-Down</td>
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<td>7. Prisoner Control: Verbal/Physical/Search</td>
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<td>8. Location/Orientation: Location/Route/Map</td>
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<td>9. Self Initiated Field Activity</td>
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<td>10. Vehicle/Pedestrian Stops: Tactics/Technique</td>
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<td>11. Interview/Interrogation Skills</td>
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<td><strong>Frequent Performance Tasks</strong></td>
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<td>12. Driving Skill: Normal/Speed Control</td>
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<td>13. Radio: Transmission/Reception/Procedure/MDT</td>
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<td>16. Accident Investigation</td>
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<td>17. Departmental Policies and Procedures</td>
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References


Davis v. Mason County, 927 F.2d 1473 (9th Cir. 1991)

Fadhl v. City and County of San Francisco, 741 F.2d 1163 (9th Cir. 1984)


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