



CALIFORNIA DISTRICT ATTORNEY INVESTIGATORS' ASSOCIATION

1351 Second Street #6011 • Napa, CA 94559 • (707) 681-5906

March 30, 2022

California Commission on Peace Officer Standards and Training
Mr. Kirk Bunch, Law Enforcement Consultant II
860 Stillwater Road, Suite 100
West Sacramento, CA. 95605

Re: Public Comment and Request for Public Hearing (Gov. §11346.8) Opposition to the Addition of the Document to the Rulemaking file Amending Commission Regulation 1005(a) Minimum Standards for Training

I am writing this letter on behalf of the California District Attorney Investigators' Association, which represents over 1,600 District Attorney Investigators statewide to stress our **strong opposition** to the addition of the document amending Regulation 1005(a) Minimum Standards for Training.

Peace Officer Standards and Training (POST)

"The Mission of the California Commission of Peace Officer Training and Standards is to continually enhance the professionalism of California Law enforcement in serving its communities."

Advancing Professionalism

"POST, with its partners, establishes and maintains the highest relevant statewide standards for selecting and training law enforcement personnel and ensures compliance with those standards. POST strives to ensure that all California law enforcement agencies have access to high-quality, cost effective training for the development of skills, knowledge, ethics and attitudes necessary for achieving and maintaining professional excellence."

The approval of this addition to the document and adoption of this regulatory change would significantly diminish the training and testing requirements for the position of District Attorney Investigator (DAI), which is in direct contradiction to the mission and values set forth by POST. It is essential for a DAI to have the mandated training provided through the Regular Basic Course (RBC) Academy. The Specialized Investigators Course (SIBC) does not provide the same amount of necessary training in their curriculum.

Brent Westwood • President
Riverside County

Richard Aloise • Vice President
Los Angeles County

George Mueller • Pres. Ex. Off.
California Department of Insurance

Leslie Pate • Chief Financial Ofc.
Napa County

Lisa Biggs • Secretary
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Amy Yardley • Sgt.-At-Arms
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Mel Sosa • Director
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Addendum-Initial Statement of Reasons POST – Consideration of Alternatives

The POST Commission took into consideration the information derived from an antiquated “comprehensive” study conducted in 1983 where the DAI position was compared to a Police Officer and Deputy Sheriff (General Law Enforcement Officer). POST claims the study identified the significant distinctions between the two classifications and the important differences in their daily job functions. Furthermore, it was ascertained the study did not reveal or suggest that DAI’s perform the same or similar functions of general law enforcement. What is concerning is that POST failed to include information from the 1983 hearings where POST determined the (SIBC) course was insufficient to meet the needs of the DAI position. The (SIBC) course is designed for a Peace Officer specialist with limited or narrow investigative responsibilities, such as alcohol beverage law or horseracing law violations.

In present day law enforcement, I can attest the duties of a DAI fall in line with general law enforcement responsibilities. For example, District Attorney Offices may participate in a vast array of proactive task force assignments. DAI’s may participate on or manage an assignment involving gang and narcotic enforcement, cold case homicide investigations, child exploitation, human trafficking, or the apprehension of dangerous felons where DAI’s regularly engage in law enforcement duties alongside Police Officers and Deputy Sheriffs.

In conclusion, CDAIA believes this proposed amendment to POST Regulation 1005(a) is unnecessary and would compromise the mission and values of POST, whereas POST strives to maintain the highest relevant statewide standards when selecting law enforcement personnel. The controversial issue of lowering minimum standards is strongly opposed statewide by District Attorneys, 49 of 52 Bureau of Investigation Chiefs, and various law enforcement associations. This alone demonstrates an unwarranted modification to Regulation 1005(a) Minimum Standards for Training is not in the best interest of our law enforcement stakeholders statewide.

I respectfully request that POST **rescind** the proposed amendment to Regulation 1005 (a) Minimum Standards for Training. If the POST Commission determines this amendment should move forward, I request that POST grant us another public hearing as per, (Gov.§11346.8). I also request that POST completes an updated comprehensive study of the DAI position by formally surveying every District Attorney’s Office for input. I request the new study be made available to the public and included in the package for review by the Office of Administrative Law (OAL). A study of the DAI position with information more recent than the 1980’s would provide POST commissioners and members of (OAL) the correct data needed before making a critical decision to amend POST Regulation 1005(a) Minimum Standards for Training.

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Sincerely,

Brent Westwood

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CDAIA President

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