							n Management
Title OPA MAR on Terry Template	Author OPA	Date 1/18/20	SPD Policy Number and Title 19 6.220 Voluntary Contacts, Terry Stops, and Detentions	 Description OPA previously recommended that SPD Policy 6.220 (10) be modified to state that when officers perform a Terry stop, a Terry template is always required (SMC 14.11.060(C)), regardless of whether officers have probable cause to arrest at the time of the Terry stop. SPD declined to accept the entirety of OPA's recommendation, creating the following exemption from the requirement of a Terry Template: "Detentions based on probable cause do not require a Terry Template, but require the officer to document the stop via a GO report" In its response to OPA's initial Management Action, SPD referenced a "PC stop," which it asserted did not fall under Terry v. Ohio. OPA disagrees with this analysis and sees no distinction between a stop based on reasonable suspicion versus probable cause where a detention is effectuated and not an arrest. OPA is also unaware of any caselaw defining the contours of a "probable cause stop." Ultimately, it is within the Department's discretion to choose not to adopt this recommendation; however, OPA would like to set up a meeting to discuss this more fully. 		dation SPD	Action Number Recipient's Response to Recommendation 2018OPA-0250 COMPLETE - letter sent to OPA 12/23/19 2019-COMP- 0023
OPA MAR on Medical Leave	OPA	7/3/20	19 4.040 Sick Leave	Modify sick leave policy and the associated leave paperwork to require employees to seek approval from the Employment Services Lieutenant (or a successor to that position) prior to leaving their place of recovery under FMLA leave.	Recipient is reviewing recommendation.	SPD	2019OPA- Reviewing; Due Date 9/30/20 Assigned to HR. 0886/2019COM SPD adheres to the same HR rules as the rest of P-0024 the city, may be a bigger issue to discuss citywide.
OPA MAR on Custodial Search	OPA	6/11/20	19 6.180 Searches - General	Revise the policy to include an exception to the requirement of a cross- gender search when no officer that shares the arrestee's gender can respond to the scene within a reasonable timeframe. In such cases, officers should be permitted to search the arrestee, regardless of whether there is a reasonable likelihood that the arrestee is armed or possesses evidence that could immediately be destroyed, lost, or lose its evidentiary value.	Completed - All - Policy changed to clarify language	SPD	20180PA- COMPLETED AS RECOMMENDED - closing letter 1107MA 19- sent 4/20/20 0016
OPA MAR on Secondary Employment	OPA	5/29/20	19 5.001 Standards and Duties	Recommendation(s) • Create guidelines to govern the approval, training, monitoring, and recordkeeping for holders of Special Commissions, ensuring that these individuals are held accountable to fundamental SPD policies, such as force, bias, professionalism, and the reporting of serious misconduct. • OPA also flagged these issues for the Office of Inspector General, which agreed to add it to its 2019 work plan. • It is OPA's understanding that SPD is already working on policies in this area and some of the abovereferenced recommendations may have already been implemented.	Recipient is reviewing recommendation.	SPD	2015OPA-IN PROCESS: Bigger issue as it may impact other0370/2019COMdepartments/entities; DUE DATE 12/31/20P-0013
OIG on Peer Intervention Program	OIG	9/26/20	18 Not an SPD Policy	I recommend SPD develop and implement a peer intervention program with the aim of providing SPD members with tools, training and authority to intervene when they observe a fellow officer engaging in unprofessional or improper behavior or conduct.	Recipient is reviewing recommendation.	CPC	

OIG Audit on Chapter 14.12, Recommendation 1	OIG	6/21/2019 Not an SPD Policy	The Chief of Police, in consultation with the City Attorney's Office, should develop a clear policy for whether written authorization is required prior to	Completed	SPD	Was determined that no authorization was needed for open source which is public
			collecting protected information from open sources or third parties. If necessary, the Chief of Police should offer suggestions to the City regarding			information
			changes to Chapter 14.12 that would provide the required clarity.			
OIG Audit on 14.12, Recommendation 2	OIG	6/21/2019 Not an SPD Policy	The Chief of Police should ensure there is a procedure in place to notify OIG of all approved written authorizations to collect protected information.	Form sent to IG for Review	SPD	Pending IG Feedback
OIG Audit on 14.12, Recommendation 3	OIG	6/21/2019 Not an SPD Policy	The Chief of Police should ensure that SPD retains records relating to approved written authorizations for at least six months, to facilitate future audit reviews.	Form sent to IG for Review	SPD	Pending IG Feedback
OIG Audit on 14.12, Recommendation 4	OIG	6/21/2019 6.060 Collection of Information for Law Enforcement Purposes	The Chief of Police should ensure that Policy 6.060, Collection of Information for Law Enforcement Purposes, includes all requirements of Chapter 14.12, being cognizant of any updates that are contemplated by the City, and ensure staff are updated on any changes or additions to the policy or Chapter.	Form sent to IG for Review	SPD	Pending IG Feedback
OIG Audit on 14.12, Recommendation 5	OIG	6/21/2019 Not an SPD Policy	The Chief of Police, in consultation with the City Attorney's Office, should	In Progress (When recipient is working to implement a recommendation)	OIG	
OlG on Crime Stoppers	OIG	4/29/2019 Not an SPD Policy	 No specific recommendation resulted from the review OIG conducted of the relationship between SPD and Crime Stoppers of Puget Sound, but the review found the following: The information-sharing relationship between SPD and CSPS appears to be unusual compared to other large police departments, such as the New York Police Department and the Los Angeles Police Department. These departments do not share their information with the local Crime Stoppers branch but may review information that Crime Stoppers sends to the department. The contract between SPD and CSPS has the potential to be problematic, as the contract. OIG received an allegation that an SPD employee released a full case file to CSPS, including the unredacted name of a child victim. If true, this would appear to be both a violation of SPD policy and state law. The review is attached. 	Completed	SPD	As of 8/4/20 Crimestoppers is no longer housed within SPD
OIG on Firearms Inventory Controls, Recommendation 1	OIG	5/23/2019 Not an SPD Policy	SPD should consider amending its practices to ensure that firearms inventory processes include all SPD-owned firearms, including those used by other city entities and converted firearms.	Completed	SPD	Concur
OIG on Firearms Inventory Control, Recommendation 2	OIG	5/23/2019 Not an SPD Policy	SPD should consider conducting a firearms inventory of all firearms formerly listed as assets and that could potentially have been overlooked by prior APRS inventories of firearms. OIG is available to assist with this inventory.	Completed	SPD	Concur
OIG on Firearms Inventory Control	OIG	5/23/2019 Not an SPD Policy	SPD should consider requiring that all lost or stolen SPD firearms be reported to the National Crime Information Center Database and the Washington State Department of Licensing.	Completed	SPD	Concur

OPA MAR on Custodial Search	OPA	8/1/2019 6.180 Searches - General	Revise the policy to include an exception to the requirement of a cross- gender search when no officer that shares the arrestee's gender can respond to the scene within a reasonable timeframe. In such cases, officers should be permitted to search the arrestee, regardless of whether there is a reasonable likelihood that the arrestee is armed or possesses evidence that could immediately be destroyed, lost, or lose its evidentiary value.	2019OPA- 0069/2019COI P-0025	COMPLETED AS RECOMMENDED
OPA MAR on ruses	OPA	11/8/2019 5.001 Standards and Duties	Add ruses to an existing in-service training module, including when they areCompleted - Response letter pendingSPDappropriate and when they shock fundamental fairness.signature		DRAFT RESPONSE LETTER; COMPLETED AS M RECOMMENDED
OPA MAR on Search Warrant Exception: Community Caretaking	OPA	11/29/2018 6.180 Searches - General	Modify policy 6.180-POL-2 to include the communityCompleted - Closing letter sent 10/16/19SPDcaretaking/Emergency Doctrine exception to the search warrant requirement as set forth in caselaw (State v. Holeman).SPD	• 20180PA- 0353 MA 18- 0101	COMPLETED AS RECOMMENDED
OPA MAR on Foot Pursuits	OPA	4/5/2018 Not an SPD Policy	 OPA recommends that the Department consider developing a policy concerning when foot pursuits of suspects are appropriate. OPA believes that the Department should evaluate whether it expects its officers to engage in such pursuits when the subject is suspected of a misdemeanor or of only committing a citable offense. This policy should optimally provide guidance as to when the risk of harm to officers, the subject, and the public outweighs the law enforcement interest in effectuating an arrest. This policy should further consider what force is appropriate during such pursuits. Specifically, the Department should evaluate whether it is in its interests, both as a matter of potential civil liability and in upholding constitutional policing, for officers to be permitted to tackle at full speed individuals who have committed non-violent, non-felony offenses, and who pose no substantiated risk to officers, civilians, or themselves. Lastly, OPA strongly advises the Department to include in training a discussion of officer decisionmaking when using force. Specifically, OPA believes that the Department needs to better train its officers to consider the downstream consequences of their actions prior to using force. Whether an officer decides to tackle onto the pavement a person suspected of a citable offense who is sprinting away on the sidewalk, or pushes someone with an outstanding warrant for a non-violent felon offense off of her moving bicycle, potentially subjecting her to catastrophic injuries, OPA has evaluated a number of cases where these necessary calculations have not been made. OPA contends that this informed decision-making is a trained skill like anything else and that it should be stressed by the Department in the 2018 use of force and/or 	2017OPA-081: MA-18-0026	3 COMPLETED AS RECOMMENDED

CPC on OPA Mediation 1	CPC	4/23/2019 Not an SPD Policy	Address prior recommendations offered by former OPA Auditors related to Recipient is reviewing recommendation. improving the mediation program.	ΟΡΑ	Reviewing
			- Allow the use of mediation for complaints involving allegations of bias or use of force when both the OPA Director and the OPA Auditor (or Inspector		
			General) agree that mediation would be more responsive to the		
			complainant and better serve the public.		
			- OPA should re-institute a robust mediation program, integrating		
			recommendations made in a 2012 OPA mediation program review.		
			- The City's Collective Bargaining Agreements with Departmental		
			employees should be modified to allow OPA to have a more informal		
			problem-solving process for certain types of complaints that can be more effectively resolved with a more immediate and flexible approach.		
			- I also asked that mediation not be routinely offered at intake for certain		
			types of allegations where we would not permit its use even if requested		
			by the complainant (e.g., misuse of authority, criminal law violation,		
			dishonesty). The offer of mediation is well intentioned to encourage		
			mediation, but is sometimes not appropriate.		
			- I agree that we should continue to recommend mediation to the parties		
			involved in allegations of racially biased policing. We should also re-		
			examine how we monitor the outcomes of these cases. Are we using meaningful measures that can reliably tell us whether mediation of these		
			types of complaints is producing favorable outcomes for both the		
			complainant and the officer?		
CPC on OPA Mediation 2	CPC	4/23/2019 Not an SPD Policy	Address Accountability System Structure Recommendations provided by Recipient is reviewing recommendation.	OPA	
			the CPC, as part of its Settlement Agreement responsibilities for review of		
			the accountability system, in April 2014, prior to the commencement of		
			bargaining.		
			See specifically Recommendation 21		
			"The Department should improve its mediation and other alternative		
			resolution processes:		
			1. Complainants who make use of a mediation or other alternative		
			resolution process should not be limited to the results of that process and		
			be able to elect that the case proceed to an OPA investigation. In such		
			cases, everything said or done in the course of the alternative processes		
			should remain privileged and may not be used against any party in subsequent administrative or legal proceedings.		
			subsequent auministrative or regar proceedings.		
			2. If the employee in a mediation or other alternative resolution process		
			does not participate in good faith, as determined by the mediator, the OPA		
			should conduct an investigation and possible discipline should remain as an		
			option for the complainant. Similarly, in such cases, everything said or done		
			in the course of the alternative processes should remain privileged and		
			may not be used against any party in subsequent administrative or legal proceedings.		
			L		
			3. The mediation or other alternative resolution process should be		
1			administered by an entity with mediation expertise rather than by SPD.		

CPC on OPA Mediation 3	CPC;#OPA	4/23/2019 Not an SPD Policy	Crosswalk and address the language in both the Seattle Police Management Association (SPMA) and the Seattle Police Officers Guild (SPOG) Collective Bargaining Agreements (CBAs) that related to mediation and Rapid Adjudication. There are barriers in both CBA's which prevent the OPA Director from fulfilling the mandate to collaborate with the other accountability partners as pursuant to 03.29.120.D, and requirements that are inconsistent with prior recommendations.	Recipient is reviewing recommendation.	OPA	
CPC on CSO Hiring 1	CPC	10/17/2019 Not an SPD Policy	Continue to work to identify and remove barriers for community service officer candidates who have appropriate inter-personal and community skills to be successful in this role, but who lack the traditional work experience, or have other factors in their backgrounds, that would not inhibit their ability to fulfill their role.	Completed - CSO Officers currently working in CPB	SPD	
CPC on CSO Hiring 2	CPC	10/17/2019 Not an SPD Policy	Create trainee program for promising candidates with limited experience as an entry point into the CSO program.	Completed - CSO Officers currently working in CPB	SPD	
DPA on Use of Force Reporting and nvestigation	ΟΡΑ	12/16/2019 8.400 Use of Force Reporting and Investigation	Reevaluate use of force reporting and investigation requirements under two common scenarios: 1) If subjects harm themselves or inadvertently suffer an injury while in police custody and while officers are not hands-on with them, and 2) When subjects injure themselves while officers are hands-on but where those officers do not cause the harm.	Recipient is reviewing recommendation.	SPD	2019OPA- Due Date 9/30/20 0186/2019COM P-0037
PC to SPD on Public Disclosure	CPC	1/20/2020 12.080 Department Records Access, Inspection, and Dissemination	The CPC recommends that we partner with the Public Disclosure Unit to assist in completing a two-pronged community engagement plan. or the first engagement to take place at a regularly scheduled public CPC Meeting, which occur on the first and third Wednesday of each month. Both SPD and CPC Communications teams would announce a 30 to 45- minute presentation to Commissioners and community attendees to review past implementation and leadership transition plans. of the second engagement would be a Lunch and Learn session for community and would be 90 minutes in duration, giving enough time for presentation, public comment, and a question-and-answer section. The proposed Lunch and Learn session would serve both as an opportunity to introduce community both to leadership and management from the Public Disclosure Unit (including the newly hired replacement for Director Perry), as well as reviewing the four years of positive changes made by the team. The CPC is happy to assist SPD in finding a community space or partner organization to host this second session. The CPC also stood in full support of any efforts and budgetary requests to expand the Public Disclosure Unit and reclassify positions.	Public Disclosure has not been able to circle back with CPC on this due to COVID, remote working, Bessie's depature and staffing issues in PDU. They look forward to working with CPC on this issue		Reviewing
PC to OPA on Rapid Adjudication (3 of 6)	CPC	1/20/2020 Not an SPD Policy	The OPA should propose some way of soliciting or accepting feedback from complainants and victims about their thoughts on the use of Rapid Adjudication for their allegation.	In Progress (When recipient is working to implement a recommendation)	OPA	Concur
PC to OPA on Rapid Adjudication (4 of 6)	CPC	1/20/2020 Not an SPD Policy	To increase transparency, the OPA should create a section on their website where Closed Case Summaries of cases where Rapid Adjudication was used are easily accessible. The OPA should promote this public-facing platform in its annual report when discussing Rapid Adjudication.		OPA	Concur
PC to OPA on Rapid Adjudication (5 of 6)	СРС	1/20/2020 Not an SPD Policy	When reporting data about Rapid Adjudication in the OPA's Annual Report, include qualitative data such as short case summaries about the cases that have gone through Rapid Adjudication.	Recipient is reviewing recommendation.	OPA	

CPC to OPA on Rapid Adjudication (6 of 6)	CPC	1/20/2020 Not an SPD Policy	The OPA should consider eventually moving towards developing and implementing a discipline matrix for Rapid Adjudication, as was originally envisioned for the program by former OPA Auditor Anne Levinson. This is a future goal that the CPC understands will be a time consuming task and take aggressive collaboration. In the meantime, we are supportive of Rapid Adjudication moving forward.	In Progress (When recipient is working to implement a recommendation)	OPA	Concur
OPA to SPD on Employee Welness	OPA	1/17/2020 5.002 Responsibilities of Employees Concerning Alleged Policy Violations	Evaluate less punitive methods of addressing employee addiction and mental illness to encourage officers to report such issues to the Department and seek out Department and City resources and care. Emphasize the Department and OPA's commitment to a compassionate and treatment-focused harm reduction model. Consider utilizing the Wellness unit in collaboration with OPA to achieve these results.	Completed - Closing letter sent 3/10/20	SPD	2019OPA-0383 COMPLETED AS RECOMMENDED / 2020COMP- 0002
OPA to SPD on BWV Recording	ΟΡΑ	1/9/2020 16.090 In-Car and Body-Worn Video	 Revise SPD Policy 16.050-POL-1(5) to clarify that supervisors are required to record screening conversations on body-worn video, regardless of whether the questioning is performed in an investigative versus administrative capacity; or Provide an e-learning or other training to ensure the policy is fully understood by supervisors. 	In Progress (When recipient is working to implement a recommendation)	SPD	20190PA-0479 Due Date 9/30/20 / 2020COMP- 0001
OPA to SPD: Use of Force Neck and Carotid Restraint	OPA	10/15/2019 8.200 Using Force	Provide instruction on how to properly apply the neck or carotid hold; the physiological results and risks of the tactic; and when the tactic is appropriate, with specific emphasis on the fact that it should only be used where deadly force would be justified.	Closed	SPD	2019OPA- OPA RECINDED RECOMMENDATION 0015/2019COM P-0030
OPA to SPD on Vehicle Pursuits	ΟΡΑ	11/1/2019 13.031 Vehicle Eluding/Pursuits	Add language requiring that reasonable suspicion for a DUI pursuit be established prior to the traffic stop being initiated.	Completed	SPD	2019OPA- COMPLETED AS RECOMMENDED 0280/2019COM P-0031
CPC on OIG 2020 Work Plan 1	CPC	12/3/2019 Not an SPD Policy	Audit/Review 911 Dispatch Center including a review of elements below, which does not represent an exhaustive list but a baseline for review: a. Review designation/classification of calls and how calls are assigned; b. Review reported race/ethnicity associated with certain calls types involving "suspect," or "Suspicious persons" c. Review Response times; d. Review response protocols; e. Review crisis and equity training for the Communication Center employees; f. Assess Seattle Police Department's response times to Shelters (DESC, youth shelters, women's shelters, etc.); and g. Complete a disparate impact analysis.	On Hold (When there has been no progress towards implementation of a recommendation, whether due to barriers or inaction)		Reviewing
CPC on OIG 2020 Work Plan 2	CPC	12/3/2019 Not an SPD Policy	Improve SPD Disciplinary Processes. The CPC asks that the OIG build on this work and, per the 2017 Accountability Ordinance, enhance SPD's culture of police accountability by collaborating with SPD to make disciplinary processes as fair, impartial, objective, certain, timely, consistent, understandable, transparent, and effective as possible.		OIG	Concur
CPC on OIG 2020 Work Plan 3	СРС	12/3/2019 Not an SPD Policy	Follow Up on OIG Recommendations: The CPC requests that the OIG track and provide updates to the CPC on the status of recommendations that have yet to be implemented completely.	In Progress (When recipient is working to implement a recommendation)	OIG	Concur
CPC on OIG 2020 Work Plan 4	CPC	12/3/2019 Not an SPD Policy	Evaluate SPD's Response to Hate Crime Reports.	On Hold (When there has been no progress towards implementation of a recommendation, whether due to barriers or inaction)	OIG	Reviewing
CPC on OIG 2020 Work Plan 5	СРС	12/3/2019 Not an SPD Policy	Assess Disparity in Police Stops.	Declined Action (Recipient declined implementing a recommendation)	OIG	Reviewing

CPC on OIG 2020 Work Plan 6	CPC	12/3/2019 Not an SPD Policy	Conduct Officer Wellness Survey: The CPC recommends that the OIG conduct a survey of SPD officers to inform efforts to ensure officer wellness.	Recipient is reviewing recommendation.	OIG	Reviewing
CPC on OIG 2020 Work Plan 7	CPC	12/3/2019 Not an SPD Policy	Conduct Sentinel Event Review on Iosia Faletogo's Shooting: The CPC requests that the OIG develop a sentinel event review process with the intention of eventually conducting a sentinel event review of the shooting of Iosia Faletogo.	On Hold (When there has been no progress towards implementation of a recommendation, whether due to barriers or inaction)		Concur
CPC on OIG 2020 Work Plan 8	СРС	12/3/2019 Not an SPD Policy	Review OPA Complaint Handling: The CPC requests that per the 2017 Accountability Ordinance, the OIG reviews and issues a report on the thoroughness, fairness, consistency, and timeliness of OPA complaint handling for cases that are that are not investigated by OPA such as cases that result in supervisor action, mediation, and rapid adjudication.	In Progress (When recipient is working to implement a recommendation)	OIG	Concur
			Furthermore, as the OPA's newly implemented rapid adjudication program rolls out, the CPC recommends that the OIG work with OPA to identify effective oversight and review mechanisms for the program.			
CPC on 2020 OIG Work Plan 9	СРС	12/3/2019 Not an SPD Policy	Audit SPD Supervision: The CPC requests that the OIG conduct an audit on SPD supervision to evaluate consistency in supervisory duties and training across Seattle, in addition to looking at accountability of supervisors. As part of the audit, we hope that the OIG give line officers an opportunity to speak candidly and provide input to the OIG on supervision and management.	On Hold (When there has been no progress towards implementation of a recommendation, whether due to barriers or inaction)		Concur
CPC on OIG 2020 Work Plan 10	CPC	12/3/2019 Not an SPD Policy	Continue Efforts on Effective Interviewing: In 2020, the CPC requests that the OIG continue to work with the CPC and SPD to bring training on effective interviewing techniques and relevant policy changes to SPD, OPA, and OIG. Once SPD investigators complete training on effective interviewing techniques and adopt and implement relevant policies, the CPC hopes that the OIG will continually audit or review SPD interviewing practices in the future.	implement a recommendation)	OIG	Concur
PA to SPD on Handling Money Evidence	OPA	3/30/2020 7.080 Money Evidence	 Create a policy governing the collection, transporting, and counting of large quantities of seized currency. The policy should state that BWV should be used to record the counting of currency. In cases where BWV recording of the incident is not possible, the policy should instruct officers to reactivate BWV while handling money and other evidence. Units should consider additional steps to ensure the integrity of the money evidence and that an accurate count is completed. Such procedures should be uniform across all units that handle such evidence. 	Recipient is reviewing recommendation.		2018OPA-0742 Reviewing, due date 9/26/20 / 2020COMP- 0003
OPA to SPD on Employee Timekeeping	OPA	3/30/2020 Not an SPD Policy	 Put in place additional measures to ensure that employees in the Training Unit and other specialty units are working the hours they are being compensated for. 	Recipient is reviewing recommendation.		2019OPA-0034 Reviewing, due date 9/26/20 / 2020COMP- 0004
DPA to SPD on Special Commission Permits	OPA	3/30/2020 5.001 Standards and Duties	 Create guidelines to govern the approval, training, monitoring and recordkeeping for Special Commission employees. OPA has had meetings with SPD HR and Legal Affairs to discuss the progress in developing these new processes; however, as OPA's previous MAR on this matter is still active, OPA renews this recommendation. 	Recipient is reviewing recommendation.		2018OPA-0358 See MA 19-0013 Line 5 above; DUE DATE / 2020COMP- 12/31/20 0005
DPA to SPD on Special Commission Permits	OPA	3/30/2020 5.001 Standards and Duties;#5.140 Bias- Free Policing;#5.120 Secondary Employment	 Create guidelines to govern the approval, training, monitoring and recordkeeping for Special Commission employees. OPA has had meetings with SPD HR and Legal Affairs to discuss the progress in developing these new processes; however, as OPA's previous MAR on this matter is still active, OPA renews this recommendation. 	Recipient is reviewing recommendation.		2018OPA-0395 See MA 19-0013 Line 5 above; DUE DATE / 2020COMP- 12/31/20 0006

OPA on Sound Transit Response	OPA	4/8/2020 Not an SPD Policy	Recommendation(s) Recipient is reviewing recommendation. SPD 20190PA-0190 Reviewing, due date 10/5/20	
			Develop a policy in consultation with the Communications Center and / 2020COMP-	
			KCSO that clearly articulates which agency has the primary responsibility of 0007	
			responding to incidents on light rail trains. This policy should:	
		o Be documented in the SPD Manual and supersede the 2015 MOU.		
			o Clearly state the responsibilities of call takers, supervisors, and sworn	
		personnel.	personnel.	
			o Consider requiring the creation of a CAD event for serious criminal (i.e.,	
			violent and/or felony) incidents on light rail trains.	
			Revisit the MOU with regional law enforcement partners and ensure that	
			any new MOUs are consistent with SPD policy.	
			Retrain relevant personnel once this policy has been created and the	
			MOUs revisited and revised to prevent incidents such as this from	
		happening again.		
		• In developing its policy, SPD should reference SPD Policy 15.265 – SR99		
			Bore Tunnel Response and its associated Communications Center Policy	
			and Procedures Manual Section 5.201 – SR99 Tunnel Responses as an	
			example of policy that clearly articulates the responsibilities of the involved	
			entities.	