



VIA EMAIL

June 6, 2019

RE: Seattle Community Police Commission Letter regarding the SPD Phase I Disparity Review

Dear Community Police Commission Co-Chairs –

I want to start by thanking you for your continued engagement with the work the Seattle Police Department is conducting in relation to our commitments under the federal consent decree. The reports that the SPD has produced over the past several years have set a national standard for police-initiated analytics and transparency. The collaborative approach SPD has taken in these reports of working with our local oversight bodies – including the CPC, the Office of Inspector General, national research partners, the Department of Justice, the Office of Police Accountability, and the Monitoring Team, has been a key ingredient in ensuring these reports are serving to better the department and the City.

This most recent report – an initial examination of disparities in officer interactions with the public – was conducted to establish the legitimacy of a methodology to identify real disparities – as was agreed to in the Sustainment Plan. The field of disparity research in the justice system is rife with conflicts in how to measure and identify disparate impact. One area where there is general agreement, however, is that assessing disparity against residential census information is not a best practice. So, in this report, we set out to apply a best practice approach in the justice field – propensity score matching – to compare police-community interaction events that were as similar as possible except for the race/ethnicity of the community member involved. In this Phase I report – the goal was to solidify the methodology and spotlight those areas where additional quantitative and qualitative work will occur during Phase II, and continuing into the future. This report was not designed to explain the circumstances leading to any identified disparity – the methodology had to be approved first. We must be able to measure and understand when and where disparity occurs if we are to do anything to effectively address it and evaluate those efforts.

With the goals of this Phase I report outlined, I will address each of your recommendations below. I do want to say that yes, I agree, the existence of disparity in the interactions the police department has with the community was not surprising. In the justice system, we know that what law enforcement confronts daily is a result of deep-rooted disparities across our society. In Phase II, as we dig deeper into the Phase I findings, we likely will uncover some issues that have little to do with police operations and/or policies, and to address them we will need broad support from the community to ameliorate underlying issues.

Responses to Recommendations

1. In future audits and reports by SPD, SPD should disaggregate Pacific Islander people from Asian people in the “Non-White” racial identification categories.

While it would be advantageous to have every community/group in its own category, it is not operationally feasible. Primarily, the department has reporting requirements from the state and federal governments that use these pre-defined census categories. Additionally, in many of these interactions officers are recording only demographics based on their perception. It would make no sense to expect officers to correctly disaggregate many of these communities – acknowledging that even at current broader categories we are misidentifying individuals when no formal identification is confirmed.

2. As SPD prepares to relaunch the Community Service Officer (CSO) program, exploring the underlying cause of disparity is paramount...How does SPD plan to utilize the CSO unit, their work, and their expertise to inform SPD’s efforts to reduce disparity in policing?

The role of the CSOs will be answered more directly in response to your additional letter specifically addressing that position. As it relates to the role of CSOs in helping understand and address disparity, the Phase II report predominantly will be focused on further understanding the disparities found in Phase I. A large part of this work will involve structured conversations with various members of affected communities – hopefully involving the CSOs, the CPC, national experts, and others – to gain insights into what is leading to some of these interactions and what factors are playing into their outcomes. The CSOs have many people in the city planning their work for them, however, and we will need to be intelligent in how they are rolled out as they build toward full capacity.

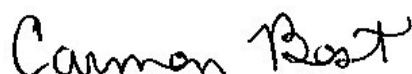
3. What are the next steps for SPD in relation to the Disparity Review? Are there plans to discuss this report with affected community?

As noted above, all of the work alluded to in this question/recommendation is the focus of the Phase II work process and report. Discussing a statistical methodology that identified areas for future work would not have been productive for the department or the community. What will be productive is engaging these communities in the hard work of understanding what is leading to these disparities – supported by more refined quantitative work. As we understand better what is happening, then we can work within the department and with community partners to design the best approaches for sharing these insights inside the department to address trainings, policies, and operations.

At this point it is premature to discuss what changes to practices could affect any of the identified disparities – the models in the Phase I report were not able to consider a variety of factors that could explain the disparity in a way that could be addressed through practice changes. Again, that is the information and discussion that must take place during the Phase II report. As noted above, we are counting on our partners, including the CPC, to assist in the work of the Phase II report – specifically on helping facilitate data-informed conversations with various members of affected communities.

The department’s Sustainment Team will be reaching out to the CPC, and others, shortly to share the initial plan for the Phase II report. As the approach is finalized, the team will then develop the schedule and tools – collaboratively – to engage the community and experts to ensure the Phase II report not only refines the analytic understanding of when and where disparity is occurring, but what is leading to it and how it can be minimized.

Sincerely,

A handwritten signature in black ink that reads "Carmen Best". The signature is written in a cursive, slightly slanted style.

Carmen Best

Chief of Police
Seattle Police Department