

Seattle  
Community  
Police Commission

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December 3, 2019

VIA EMAIL

Lisa Judge, Inspector General for Public Safety  
Office of the Inspector General for Public Safety  
[lisa.judge@seattle.gov](mailto:lisa.judge@seattle.gov)

Dear Inspector General Judge,

The Community Police Commission (CPC) wishes to share our recommendations to the Office of the Inspector General's Work Plan, pursuant to the directives included with the passage of Ord. 125315, the "Police Accountability Ordinance," which states that the IG has the authority and responsibility to:

"Create OIG's annual workplan, in consultation with OPA, CPC, and the Chair of the public safety committee, and transmit a copy to the Council by January 1. The Inspector General's annual workplan shall identify all workplan recommendations from OPA and CPC. The Inspector General's annual workplan shall also identify which of those recommendations were accepted, which were declined, and provide the reason for any declined recommendations." (Sec. 3.29.240.F.)

First, the CPC resubmits its recommendations to the OIG's 2019 work plan that the OIG deferred or did not have the opportunity to complete. Subjects recommended by the CPC in 2019 include SPD Litigation Review and an Assessment of SPD Responses to Demonstrations.

In addition to our recommendations from 2019, the CPC submits the following items as recommendations for the OIG's 2020 work plan.

**CPC's Recommendations for the OIG's Work Plan**

- 1. Audit/Review 911 Dispatch Center:** The CPC submitted this recommendation to the OIG's 2019 work plan. Although the OIG did not have sufficient resources to add it to its work plan in 2019, the OIG committed to evaluating opportunities to work on this subject. The CPC resubmits this topic as a recommendation for the OIG's work plan.

In 2018 and 2019 the CPC received multiple inquiries about the dispatch process from community partners. Concerns attached to the 911 call process and impact were pervasive in community; with questions coming in directly to the CPC from social service organizations and individual civilians, as well and more circuitously in community meetings attended by CPC staff or Commissioners. Due to the informal nature of these requests, CPC staff began a proactive exploration of the subject matter and reported issues. Concerns were broad ranging in nature, with some community wanting to protections from racially or ethnically biased 911 calls, while other community members wanting more information intake and response time. This discovery process included in-depth conversations with community members and reporting social service organizations, continuing dialog with SPD partners around dispatch and response (particularly for

those in crisis), beginning dialog with 911 Communication Centers from out of state jurisdictions, as well as inviting leadership from the 911 Communications Center to present at a CPC meeting. The presentation from the Communications Center was thorough, and professional; but raised additional questions for the CPC particularly regarding building and maintain practices that safeguard equitable policing practices. There are many ways that the Dispatch center can become liable when responding to calls that come in and influence the response of officers to calls received. Considering the significant role which the communication center plays, the request includes 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.
- 2. Improve SPD Disciplinary Processes:** In 2019, the OIG created a roadmap for understanding SPD’s disciplinary process. 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.
- 3. Follow Up on OIG Recommendations:** In 2019, the OIG conducted multiple reviews, assessments, or audits that resulted in recommendations to SPD on how to improve its practices, policies, and systems. Work by the OIG in 2019 include a review of firearms in SPD, an assessment of the Force Review Board, and an audit of SPD’s collection of information for law enforcement purposes. It is important for the CPC to know whether the recommendations that result from the OIG’s hard work are being implemented. The CPC therefore requests that the OIG track and provide updates to the CPC on the status of recommendations that have yet to be implemented completely.
- 4. Evaluate SPD’s Response to Hate Crime Reports:** This recommendation stems from the findings of the Seattle City Auditor’s report earlier this year, “Review of Hate Crime Prevention, Response, and Reporting in Seattle: Phase 2 Report.” The Auditor found a 400-percent increase in reports of hate crimes in Seattle since 2012 and made recommendations on how SPD and local prosecutors could improve responses to the spike in hate crime reports. SPD has stated that it believes that the increase in hate crime reports is “a strong indicator of the trust the community has in SPD.” The CPC, however, believes that more research likely needed on this issue.

The CPC recommends that the OIG review the auditor’s report and consider implementing its recommendations to evaluate SPD’s response to hate crimes given the drastic increase in reports.

Recommendations in the Auditor's report include using the hate crime auditing tool; gauging victim satisfaction with SPD's response efforts; assessing community perception of hate crime; and/or reviewing data on repeat offenders and victims.

- 5. Assess Disparity in Police Stops:** While there are already efforts related to the Consent Decree to evaluate disparity in police stops, the CPC requests that the OIG consider its own assessment on a subject of great import to communities disparately impacted by policing: racial disparity in police stops.

[A 2018 Stanford study](#) leveraged audio data from police body cameras to assess bias in the everyday interactions between police and the communities they serve. They used a computational linguistic method that looked at the types of words officers used with community members and evaluate them for respectfulness. Then they had police body camera audio of police interactions with community members professionally transcribed. When they applied the computational linguistic method to the transcriptions, they found the officers spoke with consistently less respect toward Black versus White community members, even after controlling for the race of the officer, the severity of the infraction, the location of the stop, and the outcome of the stop.

This study appears replicable to Seattle and could help to better understand disparity in day-to-day police stops, which may have a significant impact on community trust. It is possible that this could also be used to evaluate what, if any, effect bias training is having on police interactions with the public.

- 6. Conduct Officer Wellness Survey:** The CPC recommends that the OIG conduct a survey of SPD officers to inform efforts to ensure officer wellness. SPD is in the process of developing a possible officer wellness program and plans to move forward on this issue quickly. The accountability system partners in Seattle are committed to working collaboratively on this issue.

Following an officer wellness crisis in which nine police officers took their lives, the Inspector General for the NYPD published ["An Investigation of NYPD's Officer Wellness and Safety Services."](#) In it, they reviewed NYPD's policies, practices, and training relating to officer mental health and suicide prevention and made 12 recommendations for improvements. A key part of their investigation was an anonymous survey sent to NYPD personnel. It revealed key data showing internal support services are underutilized, a perception or fear of stigmatization is a common explanation for underused services, and a lack of training on mental health and wellness post-academy.

A well-constructed survey akin to that would be extremely beneficial, if not imperative, to Seattle's efforts to improve wellness offerings within SPD. If SPD chooses not to do one, potentially annually moving forward, this could be an area of work for the OIG's consideration.

- 7. 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. In its 2019 work plan, the Office of the Inspector General identified Sentinel Event Review as a special project. As described in the OIG's 2019 work

plan, a sentinel event review as a thorough external review process involving community members and subject matter experts to examine system failures and defects.

Mr. Faletogo was shot and killed by an SPD officer on January 31, 2019. In October 2019, OPA found the officer's conduct and shooting to be in compliance with SPD policy. Given the circumstances of the shooting, including the fact that Mr. Faletogo was constrained by multiple officers and had communicated that he was not reaching for his gun when he was shot, many members of the community, including members of the CPC, raised important questions about the potential flaws of SPD's current policy and training.

The CPC requests that the OIG develop a sentinel event review process to eventually conduct a review of the shooting of Iosia Faletogo to identify avenues for preventing incident, including changes to policy and training to avoid deadly force and to prevent the loss of life in the future.

- 8. 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.

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. For its new program, the OPA plans to forward all proposed cases to the OIG for review prior to classifying cases as eligible for rapid adjudication. In addition to playing this role, the CPC hopes the OIG will play an active role in assessing whether the rapid adjudication program is achieving its intended goals of acknowledging certain policy violations quickly and minimizing time for which an employee has a misconduct allegation pending.

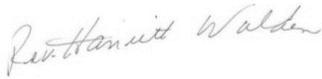
- 9. Audit SPD Supervision:** Supervisors in police departments play a significant role in many issues of great importance to the CPC including officer wellness and retention, organizational culture, discipline, and accountability of line officers. The CPC requests that the OIG conduct an audit on SPD 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.
- 10. Continue Efforts on Effective Interviewing:** Throughout 2018 and 2019, the CPC has collaborated with the OIG on efforts to bring effective interviewing techniques and best practices to SPD. The intention of this effort is to ensure that SPD does not employ deception and coercive interrogation techniques which have been shown to lead to false confessions. 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.

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The CPC appreciates the opportunity to advise on the OIG's 2020 work plan. We welcome an open dialogue and possible collaboration of certain topics were appropriate between our agencies. Please feel free to contact our Executive Director, Bessie Scott, with questions and for further discussion.

Sincerely,



Rev. Harriett Walden, Co-Chair  
Community Police Commission



Isaac Ruiz, Co-Chair  
Community Police Commission



Emma Catague, Co-Chair  
Community Police Commission

cc: Mayor Jenny Durkan  
Seattle City Council  
Chief Carmen Best, Seattle Police Department  
Seattle Community Police Commission