



# Seattle Office of Inspector General



## 2020 Annual Work Plan

# TABLE OF CONTENTS

Introduction.....	1
Audits.....	2
Policy.....	6
Special Projects.....	7
Investigations and OPA Review.....	9
Outreach and Partnerships.....	10
Inter-Agency Requests.....	10
Attachment A: OIG Work Plan Timelines.....	14

## INTRODUCTION

The Office of Inspector General for Public Safety (OIG) was established in 2017 as part of Seattle’s police oversight system. OIG provides oversight of management, practices, and policies of the Seattle Police Department (SPD) and Office of Police Accountability (OPA), monitors ongoing fidelity to reforms instituted as a result of the 2012 federal consent decree, and reviews policies and practices related to policing.

OIG promotes fairness and integrity in the delivery of law enforcement services and the investigation of police misconduct. OIG strives to make systemic recommendations for lasting reform that reflect the values of Seattle’s diverse communities.

OIG responsibilities include:

- conducting performance audits and reviews to ensure the integrity of SPD and OPA processes and operations;
- ensuring SPD is meeting its mission to address crime and improve quality of life through the delivery of constitutional, professional, and effective police services that retain the trust, respect, and support of the community;
- reviewing OPA’s intake and investigation of misconduct allegations;
- evaluating SPD response to incidents involving death, serious injury, serious use of force, mass demonstrations, or other issues of significant public concern to assess the integrity of SPD investigative processes; and
- making recommendations to policymakers for increasing fairness and integrity in the delivery of SPD services and related criminal justice system processes.

To fulfill these responsibilities, OIG has four functional units: Audit, Policy, Investigations, and Outreach, guided by an overarching goal to work toward a sustainable, accountable law enforcement system. With ten positions in 2019 and three additional positions approved for 2020, OIG staff are cross-functional in skills and assignments to provide sufficient coverage of these areas.

In its first full year of operation in 2019, a primary challenge was establishing the department and properly structuring the organization to provide expertise in these four areas to ensure high quality work products and strong objectivity – cornerstones of OIG accountability to the system. Consequently, a theme in the 2020 work plan is properly assessing and maintaining internal accountability, including building internal quality control checks.

Another focus of the 2020 work plan is developing OIG resources for the eventual integration of OIG into oversight functions currently performed by the federal monitor. It is anticipated that OIG will assume many of those oversight duties upon conclusion of the federal consent decree. In 2019, OIG took on the Force Review Board assessment in cooperation with the Court monitor and U.S. Department of Justice. Additional work may continue in 2020.

---

## AUDITS

This section of the work plan describes OIG audit work performed in accordance with the Generally Accepted Government Auditing Standards (GAGAS) promulgated by the U.S. Government Accountability Office. The audit plan reflects OIG audit priorities currently identified for the coming year, but it may be modified as circumstances change and new information becomes available.

### Audit Selection Criteria

OIG uses a risk management approach for audit selection, identifying projects through a continuous risk assessment process. This helps to maximize the effectiveness of OIG resources and focus audit efforts on issues with greater impact on the City and its residents. Risk assessment has two components: potential impact and likelihood of the impact occurring. OIG prioritizes issues with risks that have a high potential impact and a high likelihood of occurrence.

---

*The OIG audit plan is risk-based, taking into account potential impact and likelihood.*

---

In the OIG assessment process, high impact risks include, but are not limited to, those involving potential loss of life, damage to public trust, and weakening of accountability systems or major reforms. Likelihood is evaluated through a variety of factors, including past incidents and the strength of any preventative or mitigating systems.

The risk assessment process for the OIG audit plan considers information from a wide variety of sources, such as:

- information gathered by OIG staff during prior projects or on-going work;
- systematic review of SPD organizational units and policies;
- input from community members;
- referrals or work plan requests from stakeholders;
- prior audits completed by OIG, the City Auditor, or audit entities in other jurisdictions;

- reports and internal analyses produced by the City or stakeholders/partners; and
- media reports and investigations.

OIG reviews the relevancy, validity, and reliability of information sources when assessing risk and developing the audit plan.

On occasion, OIG may conduct non-audit projects not done in accordance with GAGAS. In these cases analysis of the topic or request is best served through some other format, such as a summary of best practices. However, these non-audit special projects are still subject to rigorous standards of criteria selection, evidence review, and quality control. The final selection of work plan audits also depends upon available resources.

## Ongoing Audits

OIG initiated the following audits in 2019 and expects to report on the results in the first half of 2020.

### K9

OIG is conducting an audit of the SPD K9 unit, specifically SPD's use of patrol canines. The current objective of the audit is to examine adherence to policy and consideration of applicable best practices for training, deployment, supervision, and reporting within the Canine Unit.

---

*OIG is working on four audits that began in 2019 and will wrap up in the first half of 2020.*

---

### Mutual Aid

OIG is conducting an audit of SPD operations and actions when engaging with other law enforcement agencies pursuant to task force and mutual aid agreements, to assess compliance with SPD policy.

### DNA Destruction

At the request of the Chief of Police, OIG is conducting a review of mistaken destruction of 107 DNA swabs in 2019. OIG is assessing the surrounding circumstances, policies, and the steps SPD has taken to prevent similar future occurrences.

### Chapter 14.12 Follow-up to 2019 Audit

OIG is required by ordinance to bi-annually determine whether SPD is complying with Chapter 14.12 of the Municipal Code regarding the collection of private sexual information and other restricted information. The first OIG audit of Chapter 14.12 was issued in 2019 and follow-up on those recommendations is in progress.

## Recurring Audits

OIG continuously reports on two issues at specified reporting intervals as required by municipal code and described below.

### Surveillance Review

Pursuant to Seattle Municipal Code Chapter 14.18.060, OIG will annually review SPD use of surveillance technology and department compliance with Chapter 14.18 of the Municipal Code. In 2018 and 2019, OIG attended the SPD surveillance technology community meetings held by the City to answer community questions and obtain public input about SPD's proposed acquisition of new surveillance technologies.

### Audit of Collection of Information for Law Enforcement Purposes

Pursuant to Seattle Municipal Code Chapter 14.12.330, OIG will, on a biannual basis, determine whether SPD is complying with Chapter 14.12 of the Municipal Code regarding the collection of private sexual information and other restricted information, including religious and political affiliation.

## Performance Audits

OIG will initiate the following performance audits in 2020. As OIG begins work on these audits, the scope will be further defined and adjusted as necessary based upon stakeholder input and initial fact-finding.

---

*Five new performance audits will be started in 2020.*

---

### Discipline of SPD Personnel

OIG is in the process of scoping an audit to evaluate the discipline process as it relates to consistency, fairness, and effectiveness, including the deterrence of future misconduct.

### Supervision

OIG will evaluate the consistency of duties, training, communication, and accessibility of supervisors across SPD.

### Retention

OIG will evaluate the ability of SPD to retain officers, with a focus on the demographics and reasons for officers leaving SPD employment. This work will take into account the recruitment and retention project led by the Mayor's Office in 2019 and work being done by SPD in response to that project. As a result, this audit will likely not begin until later in the year.

## **FIT/COC/OPA Issue Identification**

At the request of the Chief of Police, OIG will examine a specified case to understand how potential policy violations were not identified at various points in the review process. This audit may include assessment of the interactions between the Force Investigation Team (FIT), the chain of command (COC), and OPA.

## **Secure Firearm Storage**

At the request of the Chief of Police, OIG will evaluate the adequacy of firearms storage at the SPD training facility after a personal firearm was stolen during a training exercise and subsequently recovered.

## **Descriptive Audits**

---

*OIG will continue its work mapping complex processes involving SPD.*

---

OIG will conduct two descriptive audits in 2020 with assistance from OIG policy staff. While these audits will also follow GAGAS standards, their focus is on information and education rather than evaluation. This work may also provide a foundation for future audit work in these areas.

## **Mapping of SPD Crisis Intervention and Interactions with Health and Human Services**

Law enforcement interaction with persons in crisis is a complex topic that is made more challenging by the intersecting agencies and services that can be involved. OIG will prepare a process map to document how SPD interacts with mental health and human services partners in crisis intervention situations.

## **Use of Force and Force Investigation Team Mapping**

OIG will prepare a process map to document and describe how a use of force incident is reported, investigated, and reviewed. As a related project, OIG may also map FIT Unit core processes to provide the basis for operational standardization and potential improvement.

## **Disparity Analysis**

The 2012 federal consent decree arose out of public concerns over use of force and allegations of biased policing. These concerns are themes reflected throughout OIG work (for instance, the SPD disparity analysis review conducted by OIG policy staff in 2019). In 2020, OIG will continue to examine how SPD approaches disparity analysis of its practices, such as in the context of stops and detentions. OIG is also considering adding a project to the work plan specifically related to whether there is disparity in SPD response to mass demonstrations.

## Audit Recommendation Follow Up

OIG will periodically assess SPD response to OIG audit recommendations to ensure that accepted recommendations have been fully implemented. OIG will document implementation status in the related audit report or a separate, stand-alone report, depending on the context in which the implementation was assessed.

---

## POLICY

OIG policy staff have statistical, analytical, and process-mapping expertise that support OIG audits and other projects. This work includes conducting the trend and disparity analyses that are required components of the OIG annual report. Having completed its first full year of operations in 2019, OIG will issue the first required annual report in March 2020.

One of the goals for OIG in 2019 was to begin creating documents that lend more clarity and transparency to SPD processes. This work included an extensive mapping of the SPD disciplinary system from initiation of a complaint to discipline, appeal, and final resolution. In 2020, OIG will continue systems mapping for SPD crisis intervention and use of force as described above in the Audit section.

## Ongoing

### Trends in Inquests, Claims and Lawsuits

As required by the police accountability law, the OIG annual report will include an analysis of any patterns and trends of disproportionality or other concerns compared to previous years, including from review of inquests, claims, and lawsuits alleging police misconduct. This assessment may include assessing trends such as payout amounts over time, or whether SPD units are disproportionately represented as subjects of claims and lawsuits.

In 2019, OIG worked to identify data sources and methods to track inquests, claims and lawsuits with a goal of stable and reliable data sources for trend analysis in 2020.

### OPA Sworn and Civilian Staff Study

OPA is in the process of onboarding civilian investigators, so there is as yet insufficient data points to analyze the effect of civilian investigators on the system. Presently, OIG is conducting a literature review on this issue and will begin to study the effects of the OPA staffing transition as it unfolds in 2020.

---

*2020 plans for the policy team include literature reviews, data analysis, and technical assistance to SPD.*

---

## SPD Audit Policy & Research Section (APRS) Process Improvements

APRS is the SPD unit charged with conducting regular reviews of SPD policies and performing internal compliance audits (OIG, in contrast, mostly conducts performance audits). During 2019, OIG policy staff provided technical assistance to APRS with mapping unit processes to improve the efficiency and effectiveness of policy review. In 2020, OIG intends to expand the scope of the assistance to techniques for formalizing SPD's policy development and review processes, including utilizing risk-assessment tools to prioritize policy work.

OIG will also work collaboratively with APRS Audit staff to improve their compliance auditing practices, since improved efficiency benefits the overall accountability system. This work plan item relates to the OIG charge to look for ways to increase the effectiveness of SPD and related criminal justice system processes.

---

## SPECIAL PROJECTS

OIG identifies innovations and best practices in policing and criminal justice and works collaboratively to evaluate these topics with SPD and the other police accountability partners for potential implementation. The accountability partners, including OIG, OPA, the Community Police Commission (CPC), and SPD, meet quarterly to discuss recommendations, assess progress, and identify cross-agency issues in police accountability.

OIG has been working on three special projects that are focused on providing SPD with enhanced tools and expertise for effective law enforcement that is responsive to community needs.

### Effective Interviewing

#### a. Overview

Historically, police interview and interrogation practices that employ deception and/or use techniques not grounded in current social science research have been linked to false confessions, as well as missed opportunities to identify actual perpetrators. In 2018, SPD trained some of its investigators in effective interviewing based on a model employed in the United Kingdom (UK). Since then, SPD has worked with CPC, OIG, and OPA to explore effective models and expansion of a training program based on the UK model.

#### b. Ongoing

In late 2019, OIG, SPD, OPA, and CPC met with a consultant to discuss implementing an investigative interviewing training program for SPD, OPA, and OIG investigators, and to begin coordinating a public forum centered around the importance of effective interviewing.

---

*OIG special projects provide SPD with enhanced tools and expertise.*

---



### **c. Next Steps**

The agencies are working together to conduct trainings in 2020. In late 2020, the collaboration will culminate in a community conversation on the subject. The accountability partners will work with Seattle ACLU and local and national Innocence Project offices to host a public forum that highlights SPD training efforts and the impacts of interviewing practices on communities.

## **Sentinel Event Review**

### **a. Overview**

An event resulting in death or significant injury, or that involves public perception of improper policing, can have a lasting negative impact on a police department. It can also undermine critical relationships with community. One avenue to foster community understanding of such an event, and to critically assess the incident to determine ways to prevent future similar events, is a thorough external review process involving community members and subject matter experts. The health care and aeronautics industries have long used such processes as a non-punitive means to examine the systemic failures and defects that contribute to or allow tragic events to happen. While individual responsibility is a critical component in addressing community concern with a tragic incident, systemic analysis and improvement are critical to minimizing the likelihood of similar future tragedies.

### **b. Ongoing**

In 2019 OIG began exploring the feasibility of a review board to engage in a systems-based root cause analysis of incidents involving significant force, pursuits resulting in significant injury, and other events of public concern. The focus of the board would be systems improvement with community perspective and law enforcement subject matter experts at the table, not individual officer accountability (which is already addressed through the SPD Force Review Board and OPA).

### **c. Next Steps**

OIG plans to implement a pilot in the summer of 2020, with the goal of being able to set up a structure that can examine a significant case of public interest by 2021.

## **Peer Intervention**

### **a. Overview**

Peer intervention programs for police officers, for example the New Orleans Police Department's Ethical Policing Is Courageous (EPIC) Program, have gained attention from police departments and professional associations in the last couple of years as an innovative approach to reducing situations that result in complaints against officers and/or occurrences of officer misconduct.

---

*Systems-based root cause analysis benefits from community perspective.*

---

Significant social science research has been done on the issue of the “bystander effect.” Research has demonstrated that failing to intervene can create an atmosphere of tacit acceptance of wrongful conduct. Training SPD officers to be “active bystanders” teaches officers to recognize when a situation may be escalating into unprofessional conduct or unnecessary force and empowers officers to intervene to redirect the situation. Doing so can greatly improve service delivery and build trust with the community, and provides officers a mechanism to protect each other and the reputation of SPD.

---

*OIG will research peer intervention and wellness programs across the country in 2020.*

---

An effective peer intervention program directly benefits the community by providing officers with training and tools that reduce the likelihood that law enforcement officers will react inappropriately or unprofessionally in a high stress or heated situation. It can also benefit officers and SPD by acknowledging the realities of human nature in a high stress or frustrating encounter, and providing officers skills to intervene when needed to de-escalate and avoid unprofessional behavior or misconduct.

**b. Ongoing**

In 2018, OIG recommended that SPD consider implementation of a peer intervention program. In 2019, OIG provided technical assistance to SPD in considering peer review program options, including examining the New Orleans EPIC program. OIG has met with SPD leadership to discuss next steps and identify members of a workgroup to develop and implement a peer intervention program.

**c. Next Steps**

To assist SPD in its efforts to institute peer intervention and wellness programs, OIG will conduct a comparative analysis of peer intervention and wellness programs across the country. This analysis will provide more information to SPD decision makers to assist them when creating a local model.

---

## **INVESTIGATIONS AND OPA REVIEW**

OIG investigations staff perform reviews of OPA classification decisions and certify investigations of misconduct complaints against SPD personnel, a function that was performed by an OPA Auditor prior to implementation of the accountability law. This body of work entails reviewing OPA complaints for proper classification, and certifying whether investigations are thorough, timely, and objective. In addition, in the event a complaint is received about an OPA staff member, OIG may conduct the investigation when a conflict of interest prevents OPA from doing so.

## Ongoing

OIG will continue to work on the scope and criteria for OIG review of OPA classifications and investigations. This work is done in collaboration with OPA, so that the standards by which OIG reviews OPA work is consistent with the standards by which OPA supervises its staff. Both offices are guided by the requirements set forth in the accountability law.

## New Work

OIG will review and refine its internal quality control processes. This will include an assessment of the quality of work in performing OPA reviews in 2019.

---

## OUTREACH AND PARTNERSHIPS

Effective communications and outreach are essential to supporting the work of OIG. Increasing OIG understanding of community issues and concerns will continue to be one of the first operational priorities during 2020. In cooperation with CPC, OIG will promote conversations between community and police about police reform, best practices, and how to decrease misconduct through the use of models consistent with constitutional policing strategies and tactics.

In 2019, OIG met with community to discuss creation of community advisory groups, including a youth panel, to inform the OIG work plan. OIG has also researched and discussed advisory models used by other oversight entities, such as the City of Austin Independent Monitor. OIG plans to convene its first Youth Advisory Group in Q1 of 2020.

OIG continues to partner with CPC for assistance with community engagement on policy accountability, and to meet with groups to inform community about OIG work.

---

## INTER-AGENCY REQUESTS

OIG requests and considers input from stakeholders when establishing the annual work plan. OIG responses to such requests fall into the following four categories:

1. **Accept** – OIG will undertake a project on the topic in the current audit year;
2. **Assess** – OIG will take a preliminary assessment of the subject and evaluate it as a potential future audit;
3. **Deferred** – OIG recognizes that the topic is appropriate for OIG oversight, but reasons exist why it is not feasible to perform in the current audit year, e.g., availability of sufficient data to audit, OIG resource constraints, etc.
4. **Declined** – OIG will not undertake the project, with reason given.

# Inter-Agency Requests: Community Police Commission

---

*CPC sent ten work plan requests to OIG. OIG accepted six and will assess the rest for future work.*

---

## 1. [Assess/Deferred] Audit or Review 911 Dispatch Center

CPC requests a review of a range of topics related to the 911 Dispatch Center. These include how calls are classified and assigned, what the reported race and ethnicity were in call types involving a “suspect” or “suspicious person,” response times, response protocols, and what crisis and equity training is provided to employees. CPC also requests that OIG complete a disparate impact analysis. CPC previously made a similar request for inclusion in the 2019 work plan.

**Response:** OIG appreciates the work of CPC in this area and acknowledges the need to examine disparity in all aspects of SPD operations, including 911. OIG will review CPC’s existing research in more detail. Based on the OIG risk assessment process and available resources, OIG likely will not incorporate an audit of the 911 Dispatch Center in its 2020 work plan but will consider it as a near horizon topic. If new information increases the risk rating of items relating to the 911 Dispatch Center, OIG will consider revising the work plan to include 911 operations.

## 2. [Accept] Improve SPD Disciplinary Processes

CPC requests that OIG collaborate with SPD to improve its disciplinary process.

**Response:** OIG plans to audit the consistency and effectiveness of discipline within SPD in 2020.

## 3. [Accept] Follow Up on OIG Recommendations

CPC requests that OIG follow up on recommendations made in its 2019 reports, including a review of SPD’s firearms inventory controls, an assessment of the Force Review Board, and an audit of SPD’s collection of information for law enforcement purposes. The request includes tracking and updates on the status of recommendations not yet implemented.

**Response:** OIG follows up on the status of audit recommendations as part of its on-going work. The timing of the follow up depends on the implementation timeline proposed by SPD during the initial audit. OIG also follows up on suggestions made in non-audit products.

#### **4. [Assess/Deferred] Evaluate SPD Response to Hate Crime Reports**

CPC requests that OIG review the Seattle City Auditor's report on hate crimes and implement the report's recommendations to evaluate SPD's response to hate crimes. These include using the hate crime auditing tool, gauging victim satisfaction with SPD's efforts, assessing the community's perception of hate crimes, and reviewing data on repeat offenders and victims.

**Response:** OIG will communicate with the City Auditor to determine the City Auditor's plans for future work and follow-up in this area. Generally, OIG will not assess implementation of City auditor recommendations, as that is the purview of the original recommendation author.

#### **5. [Assess] Assess Disparity in Police Stops**

CPC requests that OIG replicate a 2018 Stanford study related to bias in police interactions with the public. That study used audio data from police body cameras and evaluated words used by officers to determine whether there was a difference in the respectfulness of word choice based on the race or ethnicity of the community member. CPC suggested that the results of such a study could also be used to evaluate what effect, if any, that bias training is having on police interactions with the public.

**Response:** The Stanford study was highly technical in nature, incorporating the use of computational linguistic analysis, professional transcribers, and 70 participants to assign politeness ratings. This type of study is better suited as a direct collaboration between SPD and an academic institution. OIG will continue to build on previous disparity work and is examining the feasibility of expanding its disparity analysis to areas such as mass demonstrations.

#### **6. [Assess/Deferred] Conduct Officer Wellness Survey**

CPC requests that OIG conduct a study like one carried out by the Inspector General for the NYPD. In it, the Inspector General reviewed NYPD's policies, practices, and training relating to officer mental and suicide prevention. The study included an anonymous survey sent to NYPD personnel, and it revealed that internal support services were underutilized, there was a fear of stigmatization for using those services, and a lack of training on mental health and wellness. CPC suggests that OIG could conduct a similar survey if SPD chooses not to do so.

**Response:** OIG will coordinate with SPD to determine whether the department plans to conduct an officer wellness survey. OIG is in regular communication with SPD about its work on officer wellness. OIG will continue to monitor SPD wellness actions and evaluate how that work fits with the planned retention audit and other OIG opportunities for assisting with officer wellness.

## **7. [Accept] Conduct Sentinel Event Review for Iosia Faletogo Case**

CPC requests that OIG conduct a sentinel event review of the Iosia Faletogo officer-involved shooting (OIS) to identify avenues for preventing similar incidents, including changes to SPD policies and training to avoid the use of deadly force.

**Response:** OIG plans to conduct a sentinel event review of the Iosia Faletogo OIS, including a review of systemic factors contributing to the incident. However, in advance of the Faletogo case, OIG plans to conduct a pilot review of another significant incident in 2020 in order to carefully and thoughtfully develop the sentinel event review process. OIG will address the Faletogo OIS thereafter, potentially in 2021.

## **8. [Accept] Review OPA Complaint Handling**

CPC requests that OIG review and issue a report on the thoroughness, fairness, consistency, and timeliness of OPA complaint handling for cases that are not investigated by OPA. For example, these include cases that result in supervisor action, mediation, and rapid adjudication.

**Response:** OIG will examine OPA complaints that resulted in mediation and rapid adjudication on an ongoing basis. Any findings will be summarized in the OIG annual report.

## **9. [Accept] Audit SPD Supervision**

CPC requests that OIG conduct an audit of SPD supervision to evaluate consistency in supervisory duties and training across Seattle as well as to examine accountability for supervisors.

**Response:** OIG plans to evaluate the consistency of duties, preparation and training, communication, and accessibility of supervisors across SPD.

## **10. [Accept] Continue Efforts on Effective Interviewing**

CPC requests that OIG continue to work with CPC and SPD to bring training on effective interviewing techniques and relevant policy changes to SPD, OPA, and OIG. CPC also requests that OIG conduct ongoing audits or review of SPD interviewing practices in the future.

**Response:** OIG is coordinating with SPD, OPA, and CPC to develop an effective interviewing training program and bring an interviewing conference to Seattle.

## ATTACHMENT A: OIG WORK PLAN TIMELINES

Project	Beginning	End
<b>AUDIT</b>		
<b>Ongoing Audits</b>		
K9	Q3 2019	Q1 2020
Mutual Aid	Q3 2019	Q2 2020
DNA Destruction	Q4 2019	Q1 2020
Chapter 14.12 Follow-up to 2019 Audit	Q4 2019	Q2 2020
<b>Recurring Audits</b>		
Surveillance Review	Q2 2020	Q3 2020
Chapter 14.12 Bi-Annual Audit	Q3 2020	Q1 2021
<b>Performance Audits</b>		
Discipline	Q2 2020	Q1 2021
Supervision	Q2 2020	Q1 2021
Retention	Q2 2020	Q2 2021
FIT/COC/OPA Issue Identification	Q2 2020	Q4 2020
Secure Firearm Storage	Q1 2020	Q3 2020
<b>Descriptive Audits</b>		
Mapping SPD Crisis Intervention	Q2 2020	Q4 2020
Mapping Use of Force	Q1 2020	Q3 2020
Mapping of SPD Force Investigation Team processes	Q2 2020	Q4 2020
<b>POLICY</b>		
Trends in Inquest, Claims and Lawsuits	Q4 2019	Q1 2020
OPA Sworn and Civilian Staff Study	Q2 2019	Q4 2020
SPD Audit Policy & Research Section Process Improvements	Q1 2020	Q3 2020
<b>SPECIAL PROJECTS</b>		
Effective Interviewing	Q2 2020	Q4 2020
Sentinel Event Review Pilot	Q2 2019	Q4 2020
Peer Intervention	Q3 2019	SPD-driven
<b>INVESTIGATIONS</b>		
Internal Quality Control Review	Q3 2019	Q4 2020
<b>OUTREACH</b>		
OIG Community Advisory Group Formation	Q2 2019	Q1 2020