

Seattle
Community
Police Commission

Our City. Our Safety. Our Police. **Better Together.**

August 11, 2014

VIA EMAIL

Mayor Ed Murray

Seattle City Councilmembers

City Attorney Pete Holmes

SPD Chief Kathleen O'Toole

RE: CPC Comments on Accountability System Recommendations of Dr. Bernard Melekian

Dear Mayor Murray, Councilmembers, City Attorney Holmes and Chief O'Toole:

Attached please find a compilation of the Community Police Commission (CPC) recommendations for improving Seattle's police accountability system. As you know, the Memorandum of Understanding between the City of Seattle and the U.S. Department of Justice (DOJ) charged the CPC to review the accountability system and propose changes.

You earlier received two separate reports from us proposing changes to the accountability structure and process. For ease of reference, those are included here, but we also show adjustments and annotations reflecting the degree of alignment we have been able to achieve with the subsequent recommendations of Dr. Bernard Melekian, the Mayor's Special Advisor. The two charts enclosed here show where the CPC, in discussions after Dr. Melekian released his own report, has modified its original position in response to his proposals, and provide comments in the few areas where its position differs in some respects from his.

We extend our deep gratitude to Dr. Melekian for the time he spent with us in the attempt to achieve the greatest possible degree of alignment among the entities making proposals for accountability reform, and the collaborative spirit in which he engaged in that project with us. We also deeply appreciate the continued assistance we have received from the OPA Director and the OPA Auditor, who have shared their views with us throughout this process.

Importantly, there is agreement among the CPC, Dr. Melekian, the OPA Auditor and the OPA Director that the current structure—involving a functionally independent civilian-led office responsible for investigations, an independent civilian auditor to oversee the effectiveness of OPA and SPD processes and systems, an oversight body representing the public's interests, and the Seattle Police Department itself—is generally sound and that its strengths should be maintained. Proposed revisions will correct problems that have been of concern to both police officers and the public.

The primary area of variance concerns the role of the OPA Auditor. Dr. Melekian favors revising the Auditor's role, making it a more traditional audit function that reviews OPA performance after case investigations are complete. The CPC understands the merits of this approach, but believes the current system of checks and balances must remain in place until—and only when—a host of systemic corrections are in place. Most particularly, a strong and highly effective civilian oversight body must be operating to ensure appropriate accountability of the OPA Director. Establishing an Office of Inspector General would be an enhancement once other key corrections to the accountability system as a whole are in place.

In a few areas there are some differences in the perspective of Dr. Melekian and the CPC, but we do not believe those differences are significant. Further discussion of the underlying principles and issues involved in these areas is welcome and will be helpful in achieving even greater alignment.

Critically, the measures jointly endorsed by the CPC and Dr. Melekian, many of which are also endorsed by the OPA Director and OPA Auditor, are an integrated set of reforms. It is vital that corrections to the system not be piecemeal, but rather are undertaken comprehensively. Some reforms can be adopted immediately by SPD and other involved City Departments. Others require either legislation and/or must be bargained with SPD unions. But in any case, there is no single "fix." The system is complex and a change in one or a few areas will not suffice.


The CPC understands that its full set of recommendations, and that of Dr. Melekian, may benefit from further refinement and welcomes an opportunity to further discuss how the City will move forward with these reforms to SPD's accountability system.

Later this week, responding to a request from Dr. Melekian, we will provide an additional document which spells out the essential characteristics and functions of an effective civilian oversight body which is critical to the revised system proposed both by the CPC and Dr. Melekian.

Sincerely,



Lisa Dugaard, Co-Chair
Community Police Commission



Diane Narasaki, Co-Chair
Community Police Commission

Enclosures

cc: Dr. Bernard Melekian
Community Police Commission

CPC Policy and Practice Recommendations and Alignment with Melekian Report

Final
08-11-14

9 recommendations - variance

46 recommendations - agreement, but some with additional CPC comments

CPC #	CPC Recommendation	Melekian Position	Melekian Report Comments (in black) CPC Follow-Up Comments (in red)
	AREAS NOT QUITE ALIGNED		
2	The Department should adopt hiring preference points for skills needed in current policing	No	Not a bad idea, but outside the scope of the OPA process. This recommendation is closely related to accountability. Hiring and promotion of employees with skills needed to meet public expectations and re-build community trust are critical.
8	The Department should establish a public response protocol for major or high profile incidents	Yes	Critical area that is deficient within SPD and should be addressed quickly. The CPC agrees, and believes that protocol should specify the role and responsibilities of both the Chief and the OPA Director.
18	OPA should be given administrative subpoena power	N/A	I cannot determine any justification for such authority. Additional language states "the reasons for needing such authority are not readily apparent" but was supported by a number of stakeholders. Thus, this is a policy decision for the city government to resolve. The CPC strongly supports giving OPA administrative subpoena power in order to ensure OPA access to non-City evidence and witnesses.
27	The Department should revise practices related to staffing to support OPA effectiveness. The OPA Director should be able to specify a pool of Captains, Lieutenants and Sergeants from which the Department will select OPA staff.	Yes	SPD should provide a pool of candidates from which the Director could make a selection, based on qualifications defined by the Director. The Director may reject candidates. The CPC is aware there have been issues with not providing the Director sufficient choices for personnel in the past and would prefer the Director recommend a slate of candidates, based on interviews and qualifications, to the Chief. If that doesn't work in terms of other Department operations, the CPC believes a suitable arrangement that maximizes OPA independence and supports Department operational integrity can be provided for in an MOU between the Chief and OPA Director (see Melekian Recommendation #12). SPD should also make it clear that working in OPA will be a valued experience for promotions.

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28	The Department should employ civilian staff in its OPA precinct liaison program	No*	A properly run program does not require a distinction between sworn and civilian staffing. It is critical that police management and supervision be involved. The structure must work, but does not hinge on whether the precinct liaison is sworn or civilian. (He is not opposed to the use of civilian personnel.) The CPC strongly supports civilian staff who report to the OPA Director for the OPA precinct liaison program to provide expertise, continuity and uniformity long-needed among precincts, especially if the role of line supervisors is increased.
40	The OPA Auditor should be notified of appeal or grievance filings and hearings and should provide input to the Director and the City Attorney's Office	No	This is a role for the OPA Director and not the Auditor. The CPC continues to support this provision as another source of useful information to the City Attorney's Office that they have indicated they would find helpful as they consider the impact of possible resolutions on policy goals and the need to ensure consistency in the way similar cases are decided.
49	The OPA Auditor should analyze the appropriateness of discipline imposed in prior cases	Yes*	This appears to be an appropriate recommendation, but the final wording will be critical. This CPC recommendation is tied to the discipline matrix recommendation and provides for the OPA Auditor to review past discipline outcomes in that context and provide input to help ensure the matrix is designed properly and will be adjusted as needed.
50	The Department should discontinue "extended authority commissions"	Yes	The utilization of retired officers could be of great benefit, but the system should be restructured. The CPC agrees that retired officers could have value in non-commissioned civilian roles, but continues to support the discontinuation of "extended authority commissions."
51	The Department should create an internal, civilian office for management and oversight of secondary employment work	Yes*	The idea is sound, but does not need to be run by civilians. As with Recommendation #28, it is the process that is of most importance.

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			The CPC strongly supports civilian staffing of an office managing and overseeing secondary employment work to prevent conflicts of interest both with the public as well as internally, because of decisions that have significant financial impacts for peers, subordinates and supervisors.
AREAS OF ALIGNMENT			
1	The Department's standards and values should support a robust and legitimate accountability system	Yes	
3	The Department's professionalism policy should articulate expectations consistent with community care-taking	Yes	
4	The Department's professionalism policy should include a conduct unbecoming policy	Yes	
5	The Department's professionalism policy regarding derogatory language should be modified to cover all members of the public rather than only those in protected classes	Yes	
6	There should be additional community-based channels for complaint filing	Yes	
7	The Department's Public and Internal Complaint Process policy (SPD Policy Manual 5.002) should be revised	Yes	
9	The City Attorney's Office should ensure impartial practices in SPD's public disclosure processes	Yes	There is a need for a standardized practice regarding such requests.
10	Materials should describe appellate and grievance review	Yes	
11	OPA should increase the frequency of communications with complainants and named employees	Yes	
12	OPA should provide a mechanism for tracking status of complaints online	Yes	
13	OPA should post results of investigations and alternative resolutions online	Yes	
14	OPA should post results of appeals and grievances online	Yes	
15	The Chief of Police should be required to notify the Mayor and Council when findings are modified due to the outcome or settlement of an appeal or grievance	Yes*	No case should be settled without the approval of the City Attorney's Office. Ideally, this is where such a process would be initiated. This is also what the CPC recommended.
16	OPA jurisdiction should be expanded	Yes	

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17	OPA involvement should be strengthened in cases involving possible criminal misconduct and tolling of the contractually-required 180-day time limit in these cases should be allowed	Yes	
19	Establish rapid adjudication process for certain types of alleged misconduct	Yes	
20	The Department should establish an informal problem-solving process for certain "customer-service" types of complaints	Yes	
21	The Department should improve its mediation and other alternative resolution processes	Yes	This is another critical area for improvement. The CPC's recommended improvements to the mediation program should be implemented so this can occur effectively.
22	Certain SPD internal investigations should be streamlined	Yes	
23	The Department should establish a protocol for investigation of allegations against OPA staff	Yes	
24	OPA should make training referrals an option in Sustained cases rather than a separate finding	Yes	
25	OPA should add a provision for "Department Management, Policy or Training Correction Required"	Yes	
26	The OPA Director should have the option to provide complainants in certain types of sustained cases an opportunity to meet with the Chief prior to the Chief making a final disciplinary decision	Yes*	The OPA Director should be able to recommend such a meeting. The determination as to whether to meet . . . should rest with the Chief. The CPC agrees that a workgroup to establish an avenue for complainant engagement and/or appeal should be convened and also seeks a re-opener on this for the collective bargaining agreement.
29	The Department should use a discipline matrix to better ensure uniformity	Yes*	The use of a discipline matrix must be designed in such a fashion so as to ensure maximum flexibility for the Chief. The CPC recommended the use of a discipline matrix and agrees it should have flexibility.
30	The Department should maintain a tracking tool to maintain records of disciplinary determinations	Yes	
31	Time limits should be established on certain steps following completion of OPA investigations	Yes	
32	The role of SPOG in investigations should be to ensure contractual and due process rights	Yes	

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33	Discipline should be imposed and implemented upon the Chief's final decision, not delayed pending a grievance or appellate process	Yes	
34	The grievance process should be exclusively used to review challenged based on contract violations	Yes	The current practice of allowing a decision to impose discipline to constitute a contractual violation for "just cause" should be stopped. The CPC believes discipline without just cause IS a contract violation but that it should be routed through a single avenue of appeal/review, not the grievance process used for other alleged violations of the contract.
35	There should be one avenue for disciplinary appeals through the Public Safety Civil Service Commission	Yes	
36	Public Safety Civil Service Commission members should be impartial parties with appropriate expertise	Yes	
37	The chair of the Public Safety Civil Service Commission should be a City hearing examiner	Yes	
38	Appellate hearings after the Chief of Police disciplinary determination should be in public	Yes*	This section should apply to formal hearings and not document review. In recommending public appellate hearings, the CPC did not intend for any further extension of public involvement.
39	Notice of appeals should be provided to the City Attorney's Office	Yes*	My recommendation is that the City Attorney should handle appeals with input from the Chief. This is also what the CPC recommended.
41	The City Attorney's Office should provide timely notice of appeal results to OPA	Yes	
42	Improved policies and practices should be instituted concerning how modifications, appellate strategies and settlement decisions of disciplinary cases are made	Yes	This is a very critical and necessary change. No settlement which reduces or eliminates discipline should be reached without the approval of the Chief. The CPC agrees.
43	The City should work to broaden the grounds for revocation of officer certification and allow the Washington State Criminal Justice Commission to initiate revocation after a final finding	Yes	
44	Department data systems should document all relevant information related to cases	Yes	
45	The Department should establish a protocol to ensure regular review of litigation and other observations and cases to improve training, hiring	Yes	

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	or policies		
46	The City Attorney's Office should assess arbitrator rulings and propose improvements	Yes	
47	The City should establish a system to ensure responsiveness to recommendations to improve accountability	Yes	
48	The City Attorney's Office should alert OPA of issues raised due to grievance or appeal that suggest practice improvements	Yes	
52	The Department should revise its In-Car Video review policy to allow for its use in training and coaching	Yes	
53	The Department should retain holding cell video for 90 days	Yes	
54	Reports describing results of investigations should include changes made as a result of appeals or grievances	Yes	
55	The City Attorney's Office and the City's Personnel Division should provide the OPA Auditor quarterly reports and information on challenged cases	Yes	

Melekian Recommendations and Alignment with CPC

3 recommendations - variance

26 recommendations - agreement

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BM #	Melekian Report Recommendation	CPC Comments
AREAS NOT QUITE ALIGNED		
16	The OPA Director should not publicly comment on matters currently under investigation. A protocol should be developed in collaboration with the Oversight Body and the Chief of Police for the dissemination of information concerning cases that generate significant public interest.	Variance. See CPC Recommendation #8. The CPC calls for a protocol which specifies the role and responsibilities of both the Chief and the OPA Director in commenting on cases at different times in the process. When a significant incident occurs, the Chief should comment appropriately. Once a case is referred to OPA it is then important for the OPA Director to be responsible for reporting on its status (not the substance of the case). The provisions for doing so should be outlined in the protocol to help underscore the functional independence of the OPA and its Director. The CPC agrees that the protocol should also include standards for disseminating information on such cases.
17	The OPA Director should have control over the selection of personnel, particularly at the senior level. The Police Department should provide a pool of candidates from which the Director could make a selection. These candidates should meet a set of qualifications as defined by the Director and the Director may reject candidates.	Agree that the Director should have control over selection of staff. Variance that the Department proposes candidates for sworn positions. See CPC Recommendation #27.7 which provides that the OPA Director specify the pool of candidates from which the Chief will select OPA staff. The CPC is aware there have been issues with not providing the Director sufficient choices for personnel in the past and would prefer the Director recommend a slate of candidates, based on interviews and qualifications, to the Chief. If that doesn't work in terms of other Department operations, the CPC believes a suitable arrangement that maximizes OPA independence and supports Department operational integrity can be provided for in an MOU between the Chief and OPA Director (see Melekian Recommendation #12). SPD should also make it clear that working in OPA will be a valued experience for promotions.
21 22	The position of OPA Auditor should be absorbed into an Office of Inspector General. The Inspector General should have adequate staff and funding to carry out oversight of all departmental functions, including the accountability process, as necessary. or During the transition phase to an Inspector General model or should the OPA Auditor position	Variance with revising role of the OPA Auditor. While the CPC agrees there may be merit in establishing an Office of Inspector General (OIG) with authority to review and propose improvements to SPD processes and systems, its paramount concern is that in doing so, the current functions of the OPA Auditor, including "real time" participation in classifying cases and ensuring thorough investigations, are preserved. Furthermore, an OIG should be considered only

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	<p>be retained: The duties of the OPA Auditor as described in the SMC should be modified so as to remove the OPA Auditor from direct operational oversight of individual cases. Rather the OPA Auditor should review the process employed and the overall outcomes for fairness, effectiveness and transparency.</p> <p>The OPA Auditor could select areas and/or cases related to accountability to review at their choosing. Additionally, they could open investigations in the same three ways proposed for the Inspector General. These would include:</p> <p>A monthly review of randomly selected cases that are reviewed for appropriateness of classification, thoroughness of investigation and adherence to timelines, etc. This is similar to what the Auditor currently provides.</p> <p>A review of a specific incident at the direction of the Oversight Body or the appropriate legislative authority.</p> <p>Random inspections of the precinct liaison functions including review of incidents that were found to not rise to the level of misconduct.</p> <p>The OPA Auditor should be provided additional staff so as to carry out the auditing function in a thorough and effective manner.</p>	<p>if: 1) the other accountability reforms are adopted and implemented; 2) both the OPA Director and the OIG report to the Oversight Body to ensure independence; 3) there are requirements for the City to follow through on OIG recommendations; and 4) sufficient funding is included for robust capacity. If the City is not able to implement this in addition to the other reform recommendations, the option remains to budget for more capacity in the City Auditor's Office for SPD-specific audit work.</p> <p>The recommendation of changing the focus of the OPA Auditor function is distinct from the merits of an OIG. Whether under or prior to an OIG being established, the recommendation is to change the Auditor function to a "traditional model," in which reviews are conducted after investigations are complete can weaken one of the current strengths of Seattle's system. The CPC understands the value of having a "bright line" between the roles of the Director and Auditor, but it believes the current arrangement is a vital and effective check that supports complete investigations and confidence in the quality of OPA investigations. This is a strength of the system that should be retained, particularly until the independent reporting relationships and public reports of the OPA Director and OIG are formalized.</p> <p>It is important that a robust public Oversight Body be in place to review performance. The same oversight structure it recommends for the OPA Director and Auditor should apply to an Inspector General (i.e. related to hiring, retention, firing, performance and reporting).</p> <p>The set of reforms supported by the CPC, the Mayor's consultant, the Auditor and others are interdependent and essential to needed improvements. It is critical to maintain the current strengths of the system of checks and balances, and that other recommendations for reform not be traded off based on an assumption that a major change in this functional area will be <u>the key "fix."</u></p>

Melekian Recommendations and Alignment with CPC

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BM #	Melekian Report Recommendation	CPC Comments
	AREAS OF ALIGNMENT	
1	The OPA Director should establish a long term goal of allowing the investigation of certain complaints by line supervision. The protocol should include a formal reporting by the precinct chain of command to OPA of their findings and recommendations. Final approval of such recommendations should be made by the OPA Director.	Agree. No Original CPC Recommendation. Investigations regarding minor issues outlined in SPD Policy 5.002, Supervisor Actions and routine performance management should all be part of a well-managed organization. The CPC supports OPA leading the work to establish over time the re-integration of line supervisors in performance and accountability processes. This should occur once appropriate training has been provided, protocols are in place, OPA has clear authority to ensure quality and timeliness, there is an integrated database, and an OPA civilian-staffed precinct liaison program to provide expertise, continuity, and uniformity of support for supervisors in this role has begun.
2	Complaints that either do not appear to rise to the level of misconduct or appear to be minor policy violations should be investigated at the precinct level. This work should be done by precinct supervision in collaboration with precinct supervisors. Such incidents should be documented, reviewed by the precinct Captain and forwarded to OPA.	Agree. See CPC Recommendation #7 & #1 above. A provision for investigating and taking corrective action on "minor violations" is stipulated in 5.002, ¶15. The policy filed with the Court does not provide that such incidents will be documented, per the CPC recommendations. The CPC concurs that the incidents should be reviewed by the precinct Captain and forwarded to OPA.
3	A strong data-driven system, as described by the Federal Monitor and others, should be utilized in order to develop a meaningful performance mentoring process.	Agree. See CPC Recommendation #44.
4	The Oversight Body should be adequately staffed and resourced to be able to carry out the functions designated to it by the Seattle Municipal Code (SMC).	Agree. See CPC Structure Recommendation (p. 5).
5	The OPA Director should deliver regular reports to the Oversight Body.	Agree. See CPC Structure Recommendation (p.6) which requires the OPA Director to provide information to the Oversight Body. The CPC agrees that the OPA Director should provide regular reports, but also believes there must be a concurrent obligation by the Mayor, SPD and others to respond and implement needed changes as appropriate.
6	Significant OPA policy changes should be submitted to the Oversight Body for approval prior to implementation.	Agree. See CPC Structure Recommendation (p. 6).

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BM #	Melekian Report Recommendation	CPC Comments
7	The Oversight Body should deliver regular written reports to the City council. Currently, a joint public meeting (Council/OPARB) is required to be held 90 days prior to the onset of labor negotiations. This requirement should be expanded to an annual report to the public . . . on police accountability.	Agree. See CPC Structure Recommendation (p. 7) which refers to the joint public meeting required per current Ordinance. The CPC agrees that the Oversight Body should deliver regular written reports - but to both the Mayor and the City Council - and issue an annual report to the public.
8	The Oversight Body should work closely with the SPD labor organizations. This could be accomplished through: Regularly scheduled meetings with labor representatives or Creating a position on the Oversight Body for a SPOG representative	Agree. CPC Structure Recommendation (p. 5) is for the CPC to be the Oversight Body (which presently has both SPOG and SPMA representatives). The CPC supports maintaining the current Commission membership configuration with clearly specified requirements for technical expertise and representation of diverse communities and interests, including SPD employees.
9	The Oversight Body should have the authority to ensure that cases of significant public interest are reported on to the Oversight Body, at least as to process and timeline. This is not to infer that the cases themselves should be commented on prior to a completion of the investigation.	Agree. No Original CPC Recommendation. The CPC supports the recommendation.
10	The Oversight Body should neither comment on individual cases while they are being investigated nor should they make independent recommendations about such cases to the Chief of Police as this is most appropriately handled by the OPA Director.	Agree. See CPC Structure Recommendation (p. 6).
11	The OPA Director should be appointed by the Mayor and confirmed by the council, but should report to the Oversight Body. However, a requirement to work collaboratively with the department, the parties to the settlement agreement and the Monitor should be a component of the Director’s annual work plan. or	Agree. See CPC Structure Recommendation (p. 3). The CPC recommended that the Mayor select candidates from those recommended by the Oversight Body, and that the Director be removed only for cause with its advice and after a public hearing. The CPC supports a hybrid model for the OPA that is functionally independent but operating within SPD to ensure sufficient authority and access to information, with the Director able to select his/her staff and investigators who are both civilian and sworn. The CPC did not stipulate that the Director report to the Oversight Body, but concurs with that recommendation, as well as that collaboration be part of the Director's annual work plan. The CPC supports having an MOU through which the means by which the Chief will exercise authority over sworn staff assigned to OPA will be established.
12	If the OPA Director is to remain under the direction of the Chief of Police, an MOU outlining the duties and responsibilities of the Director, within that framework, should be developed.	

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BM #	Melekian Report Recommendation	CPC Comments
13	The OPA Director should ensure that the complaint handling process maximizes the involvement of SPD supervisory personnel as it is critical to the long-term success of accountability. It is through the involvement of SPD supervisors that a culture of sustainable accountability will be created.	Agree. No Original CPC Recommendation. The CPC agrees that the involvement of SPD supervisory personnel is critical to developing a culture of Departmental accountability. There is no specific recommendation here, but it ties to recommendation #1 above.
14	The OPA Director should be held responsible for the development and maintenance of an appropriate personnel intervention program (i.e. “a performance mentoring program”) to identify issues with training and personnel at their earliest possible stage.	Agree. No Original CPC Recommendation. The CPC supports the recommendation. The OPA Operating Manual and the Performance Mentoring Policy (SPD Policy Manual 3.070) should be reviewed to determine if the responsibilities of the OPA Director are sufficiently detailed.
15	The CPC structural recommendations, with respect to the OPA Director should be followed, although serious consideration should be given to ensuring that a recommendation to the City Council pertaining to the removal of the OPA Director come from the Oversight Body. Such a recommendation should be a requirement before the Council could take up that issue.	Agree. See CPC Structural Recommendation (p. 3) which provides that the Director can only be removed for cause following a public hearing and Council vote. The CPC supports a provision that removal would first require the Oversight Body's recommendation for that course of action.
18	Sworn SPD personnel should serve defined terms of service within OPA. The authority of civilian OPA personnel to supervise sworn personnel should be affirmed.	Agree. See CPC Recommendation #27.1 which suggests a minimum term of service of two years. The CPC also agrees on authority of civilian OPA staff to supervise sworn staff.
19	The OPA should conduct its budgeting requests separately from the general departmental budget function so as to ensure that such requests are evaluated on the merits of the OPA mission rather than being balanced against the general needs of the department.	Agree. See CPC Structure Recommendation (p. 3).
20	The proposed precinct liaison program should be approved. The OPA must be sufficiently staffed in order to make this an effective program. The OPA Director should establish strong collaborative relationships with both the Chief of Police and the precinct Captains.	Agree. See CPC Recommendation #28. The CPC strongly supports a precinct liaison program using civilian staff who are part of OPA to ensure expertise, continuity and uniformity across precincts. The CPC concurs that the OPA Director should establish strong collaborative relationships with both the Chief and the precinct Captains.

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23	The reporting relationship between the OPA Auditor and the Oversight Body should be more clearly defined.	Agree. See CPC Structure Recommendation (p. 6) which requires the Auditor to provide information to the Oversight Body. Given that there is a need for a system that better ensures recommended improvements are in fact implemented, direct reporting to the Oversight Body by the OPA Auditor can support such an outcome (along with public reporting by the Oversight Body and provision for public response by SPD, the Mayor and City Attorney to its reports - Recommendation #7).
24	A glossary of terms related to accountability, suitable for use by the public as well as SPD/OPA should be developed. Once accepted by all stakeholders, the terms should become standard usage and should not be changed for a set number of years.	Agree. No Original CPC Recommendation. The CPC concurs with this recommendation.
25	A working group consisting of the CPC, OPA, the Police Department and the Mayor's office should review these over 100 recommendations. The group should identify those recommendations which require legislative action and report to the City Council. Those recommendations requiring legislative action should be given priority.	Agree. No Original CPC Recommendation. The OPA Auditor, the CPC and the Mayor's consultant worked to align recommendations into one comprehensive set. The CPC has recommended that a working group move forward to draft an ordinance for implementing those that require legislative action and also advise the City with regard to those that are subject to bargaining.
26	The role of SPD line supervision within the OPA process should be clarified and codified.	Agree. No Original CPC Recommendation. See Recommendations 1 and 2 above. The CPC concurs with this recommendation.
27	The chain of command review should be linear, that is it should be reviewed sequentially and commented on, in writing, by each member of the officer's chain of command.	Agree. No Original CPC Recommendation. The CPC concurs with this recommendation.
28	There should be greater reliance on mediation and other forms of alternative dispute resolution particularly where the complaint centers on perceived attitudes or motivations rather than specific conduct.	Agree. See CPC Recommendations 19, 20 & 21. The CPC's recommended improvements to the mediation program should be implemented so this can occur effectively.
29	Decisions with respect to the settlement of appeals should not originate in the police department. Rather they should be first considered by the city's Law Department. Regardless of process, no settlement should be authorized without the specific approval of the Law Department. Conversely, no settlement should be approved without the concurrence of the Chief of Police.	Agree. See CPC Recommendation #42.