



Seattle Office of Inspector General



2021 Annual Work Plan

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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). 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 operational functions: audit, policy, investigations, and strategic leadership, guided by an overarching goal to work toward a sustainable, accountable law enforcement system. Planned work in 2021 can be found in the section for each unit, as well as in the “Inter-Agency Requests” section.

OIG work in 2020 was defined by two historic events: the COVID-19 pandemic and the series of mass demonstrations demanding police reform and accountability. COVID-19 changed the way OIG performs its work, while the demonstrations altered the priorities of OIG work for 2020 and beyond. Highlights of 2020 work include the reviews of less lethal weapons and SPD’s crowd dispersal policy, as well as on-going preparation for the community-based sentinel event review of the demonstration events. OIG expects the first meeting of the sentinel event review panel to convene in January 2021.

However, in completing this work, OIG had to defer or delay planned 2020 projects and re-evaluate its work plan for 2021. For example, planned audits of SPD retention and supervision were replaced with audits of discretionary citations and anticipated requested work by the Sentinel Event Review panel.

Evaluating whether systems established under the consent decree to ensure accountability are achieving their goals will continue to be a major theme of planned work in 2021. Examples include audits of the SPD disciplinary process and discretionary stops, policy research mapping the use of force investigation process, and continued oversight of the quality and integrity of misconduct investigations. The planned work will evaluate the health of systems designed to ensure policing in Seattle meets community needs and expectations.

AUDITS

Audit Selection Criteria

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.

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.

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.

Figure 1. OIG Risk Assessment for Project Selection

| | | | | |
|------------|---|--------------------|-------------|--------------|
| Likelihood | 3 | Medium Risk | High Risk | Highest Risk |
| | 2 | Low Risk | Medium Risk | High Risk |
| | 1 | Insignificant Risk | Low Risk | Medium Risk |
| | | 1 | 2 | 3 |
| | | Potential Impact | | |

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 ongoing 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” where the work is not done under the strict standards of 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.

On-going Audits To Be Completed in 2021

OIG worked on the following audits in 2020 and plans to issue the reports in the first half of 2021. Work on these projects was delayed for much of 2020 while OIG prioritized assessments addressing SPD response to the on-going mass demonstrations. (Please note that information about audits completed and released in 2020 will be included in the OIG Annual Report.)

Audit of Temporary Storage of Secure Firearms

This audit was requested by Chief Best after an officer’s personal firearm was stolen during a training with the Police Explorers Program. OIG is evaluating the controls in place to prevent possession of firearms by unauthorized users. OIG plans to issue this report in early February 2021.

Audit of 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. OIG recently expanded the scope of this audit to include an assessment of interactions with mutual aid entities during the 2020 mass demonstrations. OIG plans to issue this report in Q2 2021.

Audit of Chapter 14.12: Current Compliance and Follow Up

OIG is assessing current compliance with Chapter 14.12 and determining whether SPD implemented the recommendations issued in 2019. This work was delayed until late fall 2020 by the COVID-19 pandemic and OIG work concerning SPD response to mass demonstrations. OIG plans to issue this report in Q1 2021.

Audit of Disciplinary Process

OIG is determining if SPD's current disciplinary process delivers consistent, effective, and transparent accountability to sworn personnel. The ability of the City to hold officers accountable for their actions remains the central and final question before the Court in the consent decree and is a foundational element of public trust in the policing process. It is important that any weaknesses in the current system are exposed and resolved as the City completes its new bargaining agreements with the police unions. OIG intends to complete its work as timely as possible to inform the bargaining process.

OIG plans to issue the final report by the conclusion of Q3 2021 and will make concerted efforts to mesh our work and deliverables with Monitoring Team deadlines. Depending on need, OIG may summarize or otherwise share the results of the in-progress audit.

Recurring Projects

OIG continuously reports on two issues at specified reporting intervals as required by municipal code. Oversight activities related to the City's surveillance and police intelligence laws are described below.

Surveillance Review

Pursuant to Section 14.18.060 of the Seattle Municipal Code (SMC), OIG must annually review SPD use of surveillance technology and department compliance with SMC Chapter 14.18. In 2020, OIG continued to monitor Chapter 14.18 activities, including attendance at meetings of the community working group, review of draft Surveillance Impact Reports, and examination of allegations concerning misuse of surveillance technology by SPD. OIG will begin assessing SPD use of surveillance technologies once Council approves technology, as required by ordinance. Timelines for the surveillance review process are driven by SPD and the Council approval process.

Review of Collection of Information for Law Enforcement Purposes

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

OIG is currently conducting an audit of compliance in this area, and continuously assesses authorizations to collect information as they are issued by SPD command. After the current audit is complete, OIG will issue biannual memos concerning its duties under Chapter 14.12. OIG will conduct follow up audits as appropriate.

2021 Performance Audits

OIG plans to initiate work on the following audits in 2021.

Audit of Discretionary Citations

This audit is in the preliminary planning stage. OIG will review data relating to discretionary citations, including body-worn video, and assess for evidence of bias and disparity as well as compliance with SPD policy. This audit is intended to evaluate aspects of SPD training, policy, and supervision. Any individual misconduct will be investigated by OPA. OIG plans to complete this audit in 2021.

Planned Audit(s) in Response to Sentinel Event Review

OIG anticipates that the community-led Sentinel Event Review Panel may request one or more audits as a by-product of their review and is allocating sufficient staff time to be able to respond to these requests. These audits will likely involve assessments of use of force, crowd management and force review.

Pre-Audit Stakeholder Analysis for 911 Call Center

At the request of CPC, the OIG will conduct a pre-audit stakeholder analysis in the anticipation of future audit work on the re-located 911 call center. Please see the Inter-Agency Request section for more details. In the interim, OIG will meet with stakeholders, including the CPC, to develop an inventory of issues to be reviewed in the subsequent audit. OIG will also request relevant documentation now to be able to perform a robust pre-and post-assessment later.

Horizon Projects

Horizon projects are priorities of OIG that will be initiated if staffing permits. OIG does not currently have sufficient staffing resources to guarantee work on these projects in 2021.

Audit of Overtime and Personnel Management

If time and staffing allow, OIG will conduct an audit of SPD overtime use and personnel management systems. The ability to reliably track and report on employee hours, including the assignment and fulfillment of overtime hours, is crucial to ensuring public dollars are spent efficiently and appropriately. Moreover, use of overtime and personnel management emerged as significant risks over the summer through both OIG review of the 2020 mass demonstrations and public concern over high wages paid to SPD personnel without adequate documentation.

OIG recognizes that the Mayor's Office is currently working on projects related to SPD overtime use, and the City Auditor is planning to follow up on previous recommendations issued in 2016. OIG will evaluate the results of this work and determine if there are any outstanding risks OIG should address.

Audit of SPD Contracting and Purchasing

If time and staffing allow, OIG will begin an audit determining whether SPD contracting and purchasing processes are robust, efficient, and in compliance with City policy. Appropriate use of City funds, particularly on items of major monetary value or related to critical areas such as training, is intrinsically connected to SPD's ability to provide transparent, efficient, and effective public safety to community.

POLICY

OIG policy staff provide statistical, analytical, and process-mapping expertise to support OIG's mission and to inform its decision-making processes. To this end, OIG policy work prioritizes developing policy information and recommendations that are (1) based on evidence to increase the effectiveness of the public safety and accountability system and (2) are responsive to the intersection of policing and race and social justice.

This section of the work plan describes the OIG policy work plan for 2021. The plan identifies high-priority issues and provides an overview of what OIG hopes to accomplish; albeit subject to change as emerging circumstances, information, and priorities change.

Policy Selection

Policy staff continuously evaluate issues and identify projects for consideration consistent with OIG's approach to risk assessment. Projects are identified as part of the annual planning process, but the unit also maintains flexibility to respond to emergent issues, like this summer's police demonstrations.

To select policy projects, two overarching priorities are considered: (1) the organizational effectiveness and efficiency of the City's public safety system and (2) policies that build trust between the community and the City's public safety agencies, particularly with Seattle Police Department. This work plan addresses the following policy topics:

- Organizational Effectiveness and Efficiency
 - issues related to organizational improvement identified by OIG continuous work (audits, policy, investigations, research on best practices and evidence, etc.);
 - issues related to organizational improvement identified by working partners and impacted stakeholders;
 - significant and unforeseen issues related to current events (i.e., COVID); and
 - issues raised by the consent decree.
- Building Trust and Legitimacy
 - racial justice and diversity components, and
 - pressing issues related to current events (i.e., biased policing and systemic racism.)

The OIG policy staff work to support OIG's overall project priorities, namely the Sentinel Event Review and the State Legislative Agenda. Similarly, the policy staff work collaboratively on audit and investigations projects that require policy analysis and will provide continuous policy and statistical support to the office as required.

Recurring Policy Projects

State Legislative Agenda

OIG issues recommendations on the City's State Legislative Agenda (SLA) each year.¹ OIG's priorities are determined by assessing themes seen in OIG work throughout the year that signal areas where greater strides may be made to improve the systems of policing through legislative efforts. OIG recommendations are also supported by considering laws, practices, and stakeholder concerns, locally and nationally.

Trends in Inquests, Claims and Lawsuits

OIG will conduct a trend analysis of issues raised in inquests, claims, and lawsuits alleging police misconduct.² Such analysis will include review for possible disparity and bias. During 2019 and 2020, OIG worked with city agencies to identify data sources, partnerships, and methods to collect and analyze relevant data.

Data Collaborations

OIG uses research methods and statistical analysis to analyze trends and issues within the accountability system. This mandate requires ensuring necessary information is being gathered and that the data is accurate for analysis of the underlying operations. OIG collaborates with police accountability system partners (CPC, OPA, and SPD) to standardize and provide access to data used by SPD, OPA and OIG for its analysis.

Moreover, the OIG policy team collaborates with system partners to produce reports that are understandable, useful, and reliable for stakeholders, the public, and SPD. During 2021, the policy team will work closely to produce such reports in the form of data dashboards in the Data Analytics Platform.

2021 Policy Projects

OPA Sworn and Civilian Staff Study

Policy staff will conduct an evidence-based qualitative and quantitative evaluation of the impact of OPA's civilianization efforts on OPA processes and outcomes for complaint investigation.³ The qualitative assessment will include an in-depth case study focusing on organizational transformation. The quantitative analysis will use outcome indicators to determine the impact of civilianization.

Mapping Use of Force

OIG will provide visual mapping of the Use of Force (UoF) incident handling process. The map will describe the process of investigation and review of force, beginning when an incident is reported. This project will analyze the process mechanisms, existing check and balances, and important decision-making steps within SPD's assessment of UoF incidents.

This process mapping and policy analysis aims to ensure constitutional policing, accountability, and transparency within SPD's UoF investigation process. Community and stakeholders will be able to understand the process and assess whether it following the parameters set by the Constitution, relevant law, and consent decree requirements.

1 This project is required by Ordinance 125315.

2 This project is required by Ordinance 125315.

3 This work is required by Ordinance 125315.

Descriptive Analysis of Bias Complaint Investigation Process

At the request of Councilmember Herbold, OIG will conduct a descriptive analysis of OPA's investigation process, structure, and outcome statistics related to bias allegations to inform future audits, recommendations, and Council decision-making. As part of this work, OIG will conduct a benchmarking analysis of how other cities investigate complaints of bias-based policing, and whether their processes incorporate input from community members.

Horizon Projects⁴

Diversity in Hiring – Barriers to Hiring Non-Sworn Personnel

As identified within SLA 2020, there is public concern centered on sworn officers carrying out functions that may be better suited to civilian personnel. As staffing allows, the policy team will research methods for reducing barriers preventing civilian personnel and agencies from performing public safety functions. This project will also examine historical and systemic barriers to hiring a diverse public safety workforce.

SPECIAL PROJECTS

OIG has been working on three special projects that will continue in 2021. These projects draw expertise and resources from all aspects of OIG to respond to community priorities and improve the quality of SPD operations.

Sentinel Event Review

A sentinel event is a significant negative outcome, such as a death or serious injury, that acts as a signal that problems within a system exist and may lead to similar bad results if the system is not examined to find root causes and proper remedies. In 2019 OIG began developing a Sentinel Event Review (SER) as a community-inclusive accountability program to foster understanding and critical assessment of such incidents to determine ways to prevent future similar events.

OIG plans to conduct the first SER to assess the critical incidents that occurred during the 2020 mass demonstrations in Seattle. This SER will take place in three phases: (1) Gathering community input and perspectives, (2) Convening an SER panel, including community members, SPD personnel, and external experts to develop analyses and findings, (3) Auditing and further reviewing systems for issues identified by the SER.

The first SER panel is scheduled to convene in January 2021. OIG will provide continuous support to the panel in the form of technical expertise and logistical support but will not play a role in panel decision-making or recommendations. For example, the OIG policy team has developed a series of briefing materials detailing uses of force and major incidents of concern to the public for the events to be reviewed by the first panel. OIG auditors will be available to interview SPD personnel and answer other questions about SPD operations and systems at the request of the panel.

⁴ As mentioned previously, horizon projects are priorities of OIG that will be started if staffing permits. OIG does not currently have sufficient staffing resources to guarantee work on these projects in 2021.

Effective Interviewing

Together with the accountability partners, OIG continues its work from 2019 in implementing an investigative interviewing training program. Implementation was originally scheduled for 2020 but delayed by the onset of the COVID-19 pandemic. The partners have developed an online training model and the first training modules began in December 2020.

The training consists of a total of 40 sessions across 9 modules. In addition to webinar presentations, there will be practical exercises and further optional reading and links accompanying each module. The training is expected to continue through the beginning of Q2 2021.

This training is part of a larger project to develop a train-the-trainer program for SPD officers, to provide foundational training to patrol and new officers, with additional advanced modules and training for investigators who require more expertise. In support of this program, OIG will partner with SPD and the expert consultant to develop policies to standardize the interviewing/interrogation practices of SPD.

Peer Intervention

OIG continues to work with SPD as SPD develops and implements a peer intervention program and corresponding training. OIG will offer technical assistance, when needed, as SPD implements Active Bystandership for Law Enforcement (ABLE) training throughout the department in January 2021. OIG has reviewed ABLE training materials and may participate as an observer in training sessions with SPD Command Staff.

INVESTIGATIONS AND OPA REVIEW

OIG investigation staff review and certify investigations conducted by OPA into allegations of misconduct against SPD personnel. OIG's review and authority to require additional investigation helps to ensure OPA investigations have been conducted in a thorough, timely, and objective manner. Additionally, on a quarterly basis, OPA classifications are reviewed by OIG for their appropriateness and to make sure that no allegations have been missed.

Ongoing Projects

OIG investigations staff members will continue to conduct individual reviews of OPA investigations and quarterly sampling of classifications, with a particular focus on those cases that are not investigated by OPA and instead returned to SPD chain of command to address.

As OIG review of core OPA functions becomes more established over time, OIG is beginning to devote more staff resources to assessing the following new or revised OPA programs and reporting the results:

- Quarterly sampling review of unsubstantiated misconduct screenings - A program to screen allegations of serious misconduct that are learned of during an internal Chain of Command review that can be clearly refuted by the evidence.
- Sampling of bias reviews closed out by OPA - Bias Reviews are one of two primary methods by which bias-based policing allegations against SPD are resolved (the second method is complaints filed directly with OPA). All bias reviews completed by supervisors in the field are submitted to OPA for final review before being closed out. Recognizing the importance of this issue to public trust, in 2020, OIG began to sample Bias Reviews closed out by OPA. OIG will monitor this area for effectiveness, limitations, and risk in how Bias Reviews are conducted by command staff.
- Mediation - Although OPA has proposed cases for mediation in 2020, none have been resolved through this alternative dispute resolution process. OIG will assess the program as more data becomes available.
- Rapid Adjudication - Rapid Adjudication can be offered as an option for employees who acknowledge their behavior was inconsistent with policy, and are willing to accept discipline without undergoing a full investigation by OPA. In 2020, OPA has submitted all cases to OIG for review prior to final classification. OIG will continue to assess the program as more data becomes available.

New Work

In 2021, OIG will implement an internal database for case reviews, along with a dashboard for case tracking. With the addition of a new staff member, OIG investigations will be able to implement stronger internal quality control processes and to issue more regular reports.

STRATEGIC LEADERSHIP, OUTREACH, AND PARTNERSHIPS

Strategic work is performed by the Inspector General to further the goals of OIG, represent the expertise of OIG in stakeholder activities, and participate in Consent Decree sustainability efforts in preparation for the future OIG sustainment role. This work includes outreach efforts to inform community about OIG work, and development of partnerships with community and other stakeholders to ensure that OIG work products are relevant and reflect public concern.

Examples of strategic leadership work include:

- providing direction for complex or sensitive OIG projects with far reaching impacts, for example development of the SER process;
- regular engagement with City stakeholders (Council, Mayor, oversight agencies, and SPD) to coordinate on the City's accountability efforts with the Consent Decree, SLA, and other major areas. This includes mandated quarterly accountability partner meetings, as well as periodic individual meetings;
- regular engagement with community members to make OIG work visible, and develop opportunities for collaboration and input;
- presentations to Council on mandated projects and as requested, including:
 - OIG Annual Work Plan
 - OIG Annual Report
 - OIG and CPC Mid-Year Accountability Report
 - reports about OIG audit and policy projects, including audits of police activities regulated by SMC Chapter 14.12 and Chapter 14.18.

In addition to the annual work plan and annual report, OIG produces memoranda throughout the year on emerging issues, typically at the request of Councilmembers, the Mayor, or in response to a request for independent technical assistance on an SPD cause of concern.

INTER-AGENCY REQUESTS

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

- **Accept** – OIG will undertake a project on the topic in the current audit year.
- **Assess** – OIG will take a preliminary assessment of the subject and evaluate it as a potential future audit.
- **Defer** – 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.
- **Refer to Other Agency** – OIG will refer to this work to a more appropriate agency, with reason given.

Community Police Commission Requests

1. *[Assess/Defer] Audit/Review/Collaboration of Youth Rights*

CPC requests to work with OIG to ensure the implementation of the MiChance Dunlap-Gittens' Youth Rights Ordinance. The MiChance Dunlap-Gittens' Youth Rights Ordinance prohibits law enforcement officers from questioning youths age 18 or younger, except in limited circumstances, where a Miranda warning is administered until a lawyer at King County Department of Public Defense explains Miranda Rights to the young people in question. The ordinance also prohibits law enforcement from requesting permission from a young person 18 years and younger to conduct a person, property, or vehicle search unless that young person has spoken with the Department of Public Defense and has chosen to waive their rights.⁵

OIG Response:

Given the relatively recent passing of the Ordinance (August 2020), there may not yet be an adequate dataset available to conduct a meaningful review, so OIG will monitor implementation of the ordinance through on-going reviews of OPA investigations and OIG attendance at meetings of the Force Review Board. If there are indications SPD is not adhering to the ordinance, OIG can adjust other projects to accommodate a more full-scale review.

OIG will remain active in monitoring the implementation of this ordinance and is interested in exploring this topic more fully in 2021 if staffing resources permit.

⁵ <https://council.seattle.gov/2020/08/17/council-passes-michance-dunlap-gittens-youth-rights-ordinance/>

2. [Accept] Audit/policy project of SPD trainings

CPC requests that OIG identify which areas are in greatest need of re-training and refreshing by reviewing OPA closed case reports and audit SPD's training efforts to confront bias and disparity.

OIG Response:

OIG shares CPC's concern over SPD trainings and the effectiveness of training. It is already an issue on the OIG risk register as a topic to address in the near future. OIG has reviewed recent studies regarding the effectiveness of bias trainings⁶ and this area remains a topic of focus.

Staffing constraints may impair the ability to undertake a full-scale general audit of the Training Section in 2021. However, the quality and effectiveness of applicable training is a significant control that is evaluated in most OIG audit projects. For example, past audits of compliance with Chapter 14.12 of Seattle Municipal Code and the SPD Canine Unit both contained findings addressing issues with training.

OIG will seek to address CPC concerns in two ways. First, OIG will review OPA closed-case reports to determine which policies and subject matter areas are the most frequently referred for re-training or new training. OIG may then request that the SPD Audit, Policy and Research Section determine implementation status and provide evidence. Second, OIG anticipates the forthcoming Audit of Discretionary Citations will include an evaluation of current training efforts concerning bias and disparity, as well as related supervision and enforcement.

3. [Accept] Measuring and addressing police bias and racial disparities.

CPC requests that OIG and CPC collaborate to determine how best to continue measuring disparity and bias.

OIG Response:

OIG already has planned a report on this topic. OIG will review certain discretionary citations for bias, as discussed previously. Additionally, OIG is in discussions with academic partners to conduct a linguistics-based analysis of body worn video focused on questions of professionalism, bias, and potential disparity.

4. [Assess/Defer] Reviewing policies and practices of the 911 Call Center

CPC requests that OIG review the policies and practices of the 911 Call Center.

OIG Response:

This is a topic the CPC has previously requested that OIG review, and OIG agrees that the 911 Call Center is an area of concern. With the movement of the 911 Call Center out of SPD, OIG plans to delay audit work until the move has been completed. In the interim, OIG will meet with stakeholders, including the CPC, to develop an inventory of issues to be reviewed in the subsequent audit. OIG will also request relevant documentation now to retain the ability to perform a robust pre-and post-analysis later. This will allow OIG to assess whether the move addressed the identified concerns, or if more action is needed.

⁶ <https://www.npr.org/2020/09/10/909380525/nypd-study-implicit-bias-training-changes-minds-not-necessarily-behavior>

5. *[Refer to Other Agency] Evaluating SPD's response to hate crimes*

CPC requests that OIG review the City Auditor's report on hate crimes and monitor SPD's implementation of audit recommendations.

OIG Response:

OIG confirmed the City Auditor will be reporting on the status of recommendations related to this audit in April 2021. Generally, OIG will not assess implementation of City Auditor recommendations, as that is the purview of the original recommendation author.

6. *[Defer] 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.

OIG Response:

OIG is in regular communication with SPD about its work on officer wellness. Currently, SPD is working on the development of an Early Intervention System. As part of this project, SPD is conducting an officer wellness-oriented survey to provide a baseline for its officer risk assessment. OIG is mindful that conducting additional survey-related work at the same time might be counter-productive, but will monitor SPD wellness actions and evaluate how that work fits with retention efforts and other OIG opportunities for assisting with officer wellness. Additionally, OIG does not have sufficient staffing resources in 2021 to conduct a study on the scale of that performed by the Inspector General for NYPD, given OIG's other work priorities and requirements, so SPD's current efforts are fortuitous in providing ongoing attention to the issue of officer wellness.

OPA Requests

OPA did not submit any requests to OIG.

Requests from Councilmembers

OIG received work plan requests from Councilmember Herbold.

1. *[Accept] Bias Complaints Investigation Process*

Please review the investigation process, structure, and outcome statistics of bias complaints at OPA to determine whether the process might benefit from a Biased-Policing Review Team (of community members) to investigate and review bias complaints and possibly make recommendations before OPA takes action?

OIG Response:

OIG will conduct a descriptive analysis of OPA's investigation process, structure, and outcome statistics related to bias allegations to inform future audits, recommendations, and Council decision-making. As part of this work, OIG will conduct a benchmarking analysis of how other cities investigate bias-based policing complaints, and whether their processes incorporate input from community members.

2. *[Accept] Oversight of 911 and Parking Enforcement*

Please review impact of 911 dispatch and Parking Enforcement Officers moving out of SPD on OPA/OIG authority.

OIG Response:

The accountability ordinance provides that the scope of OIG oversight authority is public safety at large. Section 3.29.200 of the accountability ordinance provides:

“G. OIG may also conduct audits and reviews for any areas that may (a) involve potential conflicts of interest; (b) involve possible fraud, waste, abuse, inefficiency, or ineffectiveness; (c) undermine accountability or be unethical; or (d) otherwise compromise the public’s trust in the police or the criminal justice system.

H. OIG shall have the authority to review and audit policies and practices of other City departments and offices in areas related to policing and criminal justice matters.” (emphasis added)

While OIG therefore has pre-existing broad authority, OPA does not have similar authority provisions, because OPA functions address SPD actions, rather than the OIG systemic lens. OIG will work with the accountability system partners, including Council, to address provision of oversight of public safety functions that have moved outside the scope of SPD.

3. *[Accept] Annual Follow Up on Recommendations*

Please consider creation of annual approach for follow-up on OIG recommendations, using the model of the City Auditor’s Status Reports on Implementation of Office of City Auditor Recommendations.

OIG Response:

Conducting an annual audit of recommendation status is ideal but not possible given current staffing and competing audit priorities. To accommodate the desire for increased transparency and accountability, OIG proposes to report on this information via an online dashboard that is updated with information as OIG receives and validates information from SPD. OIG will consult with CPC to determine if their forthcoming recommendation dashboard is sufficient or if additional work by OIG is needed.

4. *[Refer to Other Agency] Test Implementation of Previous Recommendations on Hate Crimes*

I support the spirit of CPC’s request in 2019 and again in 2020 for OIG to evaluate SPD’s response to implementation of auditor recommendations re: hate crimes.

OIG Response:

OIG is referring this request to another department not because of its content, but because of jurisdiction. The City Auditor conducted the work for the 2019 Hate Crimes audit and issued the recommendations. They are in the best position to follow up on that work and it is their work to initiate or decline. If the City Auditor defers this work to OIG and the accountability partners, OIG may be able to begin work in this area in Q4 2021. In the interim, the CPC may be an excellent partner in researching best practices for preventing hate crimes and crimes of bias as well as restorative justice responses, as requested by the Councilmember.

ATTACHMENT A: OIG WORK PLAN TIMELINE OF PROJECTS

| Project | Beginning | End |
|--|-------------------|-------------------|
| Audit Projects | | |
| <i>Ongoing Audits</i> | | |
| Temporary Storage of Secure Firearms | Q1 2020 | Q1 2021 |
| Chapter 14.12: Current Compliance and Follow Up | Q4 2020 | Q1 2021 |
| Mutual Aid | Q3 2019 | Q2 2021 |
| Disciplinary Process | Q4 2020 | Q3 2021 |
| <i>Recurring Projects</i> | | |
| Surveillance Review | Q2 2021 | Q3 2021 |
| Chapter 14.12 Bi-Annual Memo | Q1 2021 | Q3 2021 |
| <i>2021 Performance Audits</i> | | |
| Discretionary Citations | Q1 2021 | Q4 2021 |
| Sentinel Event Review Audit | TBD by SER Panel | TBD |
| Policy Projects | | |
| <i>Recurring Projects</i> | | |
| State Legislative Agenda | Q4 2021 | Q4 2021 |
| Trends in Inquests, Claims and Lawsuits | Q1 2021 | Q2 2021 |
| Data Collaborations | Q1 2021 | Q4 2021 |
| <i>2021 Policy Team Projects</i> | | |
| OPA Sworn and Civilian Staff Study | Q2 2021 | Q2 2022 |
| Mapping Use of Force | Q1 2021 | Q3 2021 |
| Special Projects | | |
| Sentinel Event Review (First Panel) | Q2 2020 | Q2 2021 |
| Effective Interviewing | Q1 2019 | Q2 2021 |
| Peer Intervention | Q3 2018 | SPD-driven |
| Investigations and OPA Review | | |
| <i>Recurring Projects</i> | | |
| Individual reviews of OPA investigations | Continuous | Continuous |
| Quarterly sampling of classifications | Quarterly | Quarterly |
| <i>2021 Investigation Teams Projects</i> | | |
| Creation of internal database | Q2 2021 | Q4 2021 |
| Creation of case tracking dashboard | Q1 2021 | Q3 2021 |
| Other Departmental Annual Work | | |
| Annual Work Plan | Q4 2021 | Q4 2021 |
| OIG & CPC Mid-Year Report | Q3 2021 | Q3 2021 |
| Annual Report | Q4 2020 | Q1 2021 |
| Memoranda on Emerging Issues | As needed | As needed |
| Inter-Agency Requests | | |
| Testing of SPD Adherence to to MiChance Dunlap-Gittens' Youth Rights Ordinance | TBD based on risk | TBD based on risk |
| Review of OPA Reports to Determine Trends on Training Referrals | Q3 2021 | Q3 2021 |
| Pre-Audit Stakeholder Analysis for 911 Call Center | Q1 2021 | Q1 2021 |
| Linguistics-Based Analysis of Body-worn Video | Q3 2021 | Q3 2022 |
| Descriptive Analysis of Bias Complaint Investigation Process | Q3 2021 | Q4 2021 |
| Review of Impact on Oversight of Move of 911 Call Center and PEO | Q1 2021 | Q2 2021 |
| Creation of Online Dashboard for Recommendation Tracking | Q2 2021 | Q3 2021 |