



Seattle Office of
Inspector General

Annual Study of OPA Sworn and Civilian Staffing

December 15, 2023

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This report assesses the Office of Police Accountability's (OPA) use of both sworn and civilian staff for investigating police misconduct and highlights opportunities for systemic improvements. The Office of Inspector General (OIG) reviewed investigation certification data, as well as the timeliness, thoroughness and objectiveness of investigations conducted by OPA investigative staff and conducted surveys of staff from oversight agencies in other jurisdictions for this project. This is a preliminary review of OPA staff and OIG will make recommendations in future reports.

Executive summary

OPA is an independent, civilian-led agency that investigates misconduct allegations against Seattle Police Department (SPD) employees. Since 2019, OPA has employed both sworn and civilian investigators. A sworn investigator is defined as an individual who currently works for SPD as a sworn officer.¹ A civilian investigator cannot be formerly employed as a sworn member for SPD.²

This report examines whether the sworn status of investigators has an impact on investigations, by comparing OIG Certifications of OPA sworn staff investigations with OPA civilian staff investigations. This assessment addresses the following elements of the 2017 Accountability Ordinance, Seattle Municipal Code 3.29.270.D, and the OIG 2023 Work Plan:

- OIG shall, by the end of the first Inspector General's first full year, conduct a study to ascertain the effectiveness of OPA's mixed sworn and civilian staffing arrangements and provide recommendations to the Council as to whether further changes are warranted.³
- The Inspector General shall produce annual reports that are readily understandable and useful to policymakers. The annual report shall include, but not limited to, the following: "... (8) The outcome of reviews of successful practices in other jurisdictions, and any associated OIG recommendations, including changes in the mix of OPA sworn and civilian staff."⁴

This analysis was conducted using two sources of data: A baseline survey of thirteen oversight agencies conducted by OIG in 2020, and an OIG analysis of OPA full and expedited investigations from June 2022 to June 2023.⁵ The key findings are summarized below:

- **Survey.** Respondents to the 2020 survey indicated that sworn investigators have more access and more training in comparison to civilian investigators. However, survey respondents noted that police accountability agencies with a mix of civilian and sworn investigators contribute to increasing diversity of thought by sharing different experiences and creating a multidisciplinary investigation environment.

1 Law enforcement Officer: "[...] an employee of a federal governmental agency who is authorized by law to engage in or supervise the prevention, detection, investigation, or prosecution of, or the incarceration of any person for, any violation of law, and who has statutory powers of arrest." RWC 10.108.120. Federal peace officer: "[...] any employee or agent of the United States government who has the authority to carry firearms and make warrantless arrests and whose duties involve the enforcement of criminal laws of the United States." RWC 10.93.020.

2 Ordinance 125315 3.29.140(D)

3 Resolution 31753 Section 4

4 Seattle Municipal Code 3.29.270(D)

5 OIG chose this time period to account due to OPA have no or one civilian investigator.

- **Certification.** When comparing full investigations grouped by complexity, content, and similar allegations, all cases led by civilian investigators were fully certified after first submission, in contrast to 44% of investigations led by sworn investigators.⁶ When comparing expedited investigations, most cases led by civilians were fully certified after first submission (93%), and fewer cases led by sworn investigators (78%).
- **Objectiveness, timeliness, and thoroughness.** When comparing full investigations, cases met the criteria regardless of the type of investigator. When comparing expedited investigations, objectiveness and timeliness was met in all cases led by civilian investigators.
- **Notes.** Investigations led by civilians were more likely to have notes or annotations related to objectiveness, timeliness, and thoroughness than those led by their counterparts.⁷ In expedited investigations, notes were most often found on cases assigned to sworn investigators.

This report has some limitations. OIG and OPA use different criteria for determining whether an investigation plan contains the minimum detailed plan as required by the City. Due to high attrition rates and SPOG restrictions on the role and number of civilian investigators, the complexity of investigations conducted by sworn investigators differs from those conducted by civilians. Consequently, comparison is challenging, and sample size is limited. Lastly, compensation, salary, and incentives available to sworn investigators differ from those available to their counterpart.

Background

The 2020 OIG survey gathered information about different approaches to police misconduct investigations. Responses were drawn from thirteen oversight systems. Responses are summarized below.

Policy oversight entity. Nine of the respondents worked in agencies that are not legally responsible for investigating allegations of police misconduct. Most respondents worked in oversight agencies independent from the police department and had their own budget.

Staffing composition and limitations. Seven respondents worked in civilian-only oversight agencies, three respondents in sworn-only oversight agencies, and one in an agency with a mix of sworn and civilian investigators. Most respondents did not have a prescribed ratio of sworn or civilian staff; two respondents noted their agencies are limited in hiring mixed staff due to local ordinances. Eight respondents identified limitations for civilian investigators or supervisors regarding the type of allegations they could review. Respondents stated that, in some agencies, civilian investigators are not allowed to review cases involving serious misconduct allegations.

Characteristics and qualifications of investigative staff.

Two respondents reported that sworn investigators have access to more information than their counterparts (ex. Body worn videos and police department databases). Three respondents indicated that civilian investigators had strong communication and time management skills and have legal expertise/background. On the other hand, two respondents noted sworn investigators have more access to training and are more skilled at conducting investigations.

Perception of police accountability. Two respondents reported sworn personnel in their agencies have access to data not available to civilian personnel. Two respondents indicated law enforcement experience gave sworn personnel a different perspective than civilian personnel which allowed investigators to conduct assertive interviews. Eight respondents noted the main advantages of police accountability agencies employing civilians (or a combination of civilian and sworn investigators) is an increased variety of perspectives on staff.

6 Full Investigation include interviewing the complainant and involved officer(s), identifying, and interviewing independent witnesses, as well as collecting and reviewing additional evidence. Expedited investigations are those where findings can be reached based on the intake investigation, and no further investigation needs to be included.

7 Full certification with notes is a type of case certification. Notes are annotations related to the thoroughness, timeliness, and objectivity of cases. Notes are not significant enough to impact the certification of a case.

Full investigations

OPA investigates alleged violations of SPD policy, such as allegations of unnecessary or excessive force or biased policing.⁸ Full investigations may include interviewing the complainant and involved officer(s), identifying, and interviewing independent witnesses, as well as collecting and reviewing additional evidence.

Cases are assigned by OPA supervisors. Supervisors consider factors such as investigator expertise and workload in case assignment. Investigations are also assigned based on contractual agreements. For instance, “when the lead investigating employee is a lower ranking sworn employee than the one being investigated, conflict of interest disclosures must be completed by both the investigator and the named employee on a form to be developed by OPA.”

For instance, “when the lead investigating employee is a lower ranking sworn employee than the one being investigated, conflict of interest disclosures must be completed by both the investigator and the named employee on a form to be developed by OPA”⁹

The current Seattle Police Officers Guild (SPOG) collective bargaining agreement limits OPA to two civilian investigators positions.¹⁰ In 2022, the OPA investigative team consisted of nine SPD sergeants and two civilians.¹¹

Based on the number of allegations received and completed by OPA in 2022 and the internal information managed by OIG, 158 full investigations were certified in 2022. Figure 1 depicts the count and percentage of full investigations completed by OPA investigative staff and certified by OIG. Sworn investigators conducted 141 investigations and civilian investigators conducted 17 investigations. Sworn investigators completed nearly double the number of cases as civilian investigators, at an average of nine cases per civilian investigator and sixteen cases per sworn investigator.

OIG reviews OPA investigations and certifies them for timeliness, thoroughness, and objectivity.¹² OIG’s Investigations team developed an internal rubric to guide investigation review¹³. Notes from the rubric are included on Table 1 along with OIG certification decisions.

Criteria OIG should consider in reviewing investigations include, but are not limited to: (a) whether witnesses were contacted, interviewed, and all other material evidence was timely collected; (b) whether interviews were thorough and unbiased and conflicting testimony was sufficiently addressed; (c) whether additional clarifying information would strengthen the investigation; (d) whether the written summary and analysis are objective and accurately reflect the evidence; and (e) whether applicable OPA procedures were followed and the intake and investigation were conducted in accordance with the OPA manual.¹⁴

8 Ordinance 125315, § 3.29.125(A)

9 SPMA 16.4(A)

10 SPOG Agreement, Appendix D, part one

11 OPA 2022 Annual Report

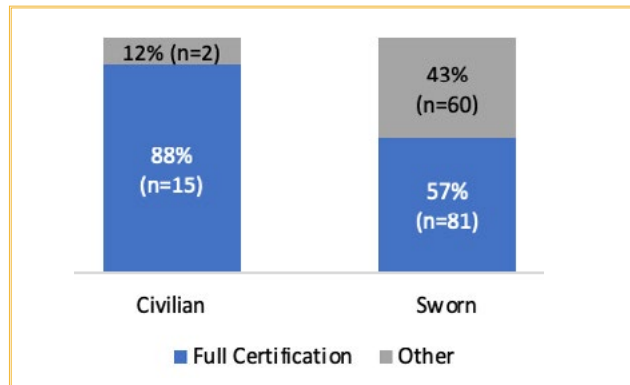
12 Ordinance 125315, supra, § 3.29.260(A)

13 Rubric based on the OPA Internal Operations and Training Manual, the Department of Justice (DOJ) Settlement Agreement (Consent Decree) and Ordinance 125315. Consent Decree: In 2012, the City of Seattle and the United States Department of Justice entered into a settlement agreement, or “Consent Decree” that requires Seattle to implement reforms “with the goal of ensuring that police services are delivered to the people of Seattle in a manner that fully complies with the Constitution and laws of the United States, effectively ensures public trust and officer safety, and promotes public confidence...” (Settlement Agreement, ¶ 1)

14 Ordinance 125315, supra, § 3.29.260(F)

Figure 1

Full investigations certification by investigator in 2022



Note: Total cases were determined based on complaints received in 2022. Other: Full Certification with Notes, Partial Certification and Full Certification cases after resubmission. Counts in parenthesis.

Source: OIG Investigation unit internal data.

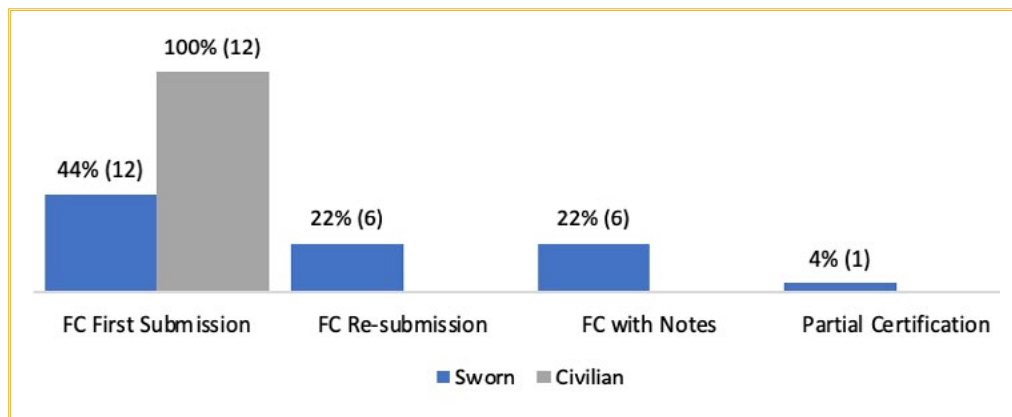
For this review, OIG collected complaints classified for full investigation between June 1, 2022, and June 30, 2023, then grouped cases based on complaint similarities, OPA allegation category, SPD policies under review, and case complexity. Each group contained at least one case assigned to a civilian investigator.

Table 1 in Appendix B presents the list of full investigations selected for this analysis. Each case displays its OPA allegation category, the type of investigator that worked on each case (sworn or civilian), OIG certification resolution, and any deficiency or note added by OIG during the review process.

Certification. Figure 2 depicts a summary of certification resolutions for full investigations presented in Appendix B. The only comparable category between OPA staff investigations was certification resolution, as all investigations led by civilian investigators were fully certified after the first submission. Less than half of the investigations submitted by sworn investigators were certified as thorough, timely, and objective after the first submission. For investigations conducted by sworn investigators, OIG requested or directed further investigation for 22% of fully certified investigations because the information provided in the first submission was insufficient to determine a certification resolution.

Figure 2

Certification resolution of full investigations led by OPA staff



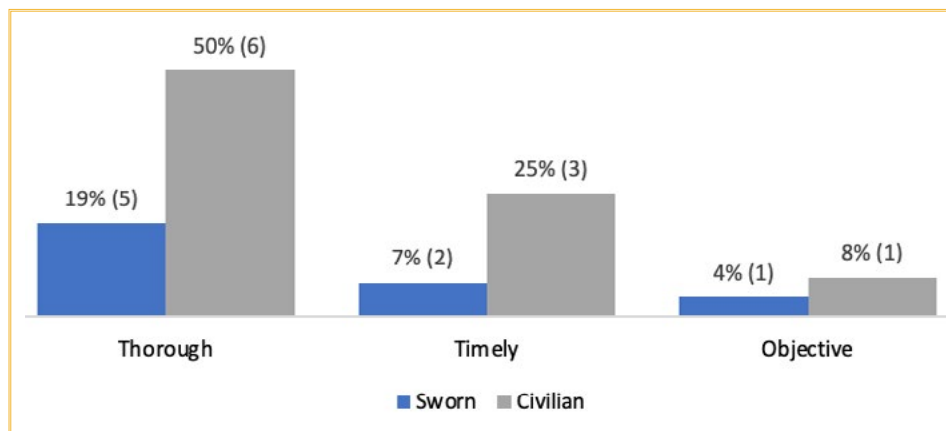
Source: Based on Table 1 data. FC: Full Certification. Counts in parenthesis. Full Investigations between June 1, 2022, and June 30, 2023.

Notes. Notes are provided by OIG on areas for potential improvements in an investigation, even though the issues are not significant enough to impact certification of the case. Except for one case, all full investigations in this analysis were certified as thorough, objective, and timely. However, minor issues and areas for improvement were noted.

- **Thoroughness.** Full Investigations led by civilian investigators accrued more notes related to thoroughness than those led by sworn staff. The most common notes were related to the lack of a detailed Investigation Plan as required by the Accountability Ordinance. The other notes were related to deficiencies in investigation plans (one note for sworn investigation) and documentation, analysis, and summarization of information (four notes for civilian investigations).
- **Timeliness.** Notes within this category were more common in investigations led by civilian staff than those led by sworn investigators. Investigations with significant delays between the preliminary investigation and the interview(s) with named employee(s) were found in both civilian (two notes) and sworn investigations (one note). One civilian-led investigation included a note related to the method by which the complaint was addressed relative to its complexity.
- **Objectivity.** Minimal issues related to the objectiveness of investigations were identified, with one note each for a sworn and civilian investigator.

Figure 3

Full investigation: Percentage of notes by category and type of investigator



Source: Based on Table 1 data. Note: Percentage based on the total number of cases per investigator. Counts in parenthesis.

Limitations of Findings. OIG identified barriers in the continuity of analysis:

- The interpretation of a minimum detailed plan as required by the ordinance differed from OIG and OPA perspective. OIG uses a set of metrics to evaluate investigations based on the OPA manual, Consent Decree, and the Accountability Ordinance. Therefore, most of the investigations that included a note related to thoroughness were due to OIG and OPA interpretation. Issues identified by OIG included inadequate planning of investigations, failure to document, analyze and summarize information, and lack of timeliness.
- The role of civilian investigators is determined by SPOG. A sworn investigator must be assigned to certain serious cases.¹⁵ This limits the type of cases assigned to civilian investigators. Similarly, SPOG limitation on the number of civilian investigators contributes to an imbalanced caseload between groups.

15 SPOG Agreement, Appendix D



- OPA has a high attrition rate of civilian investigators. Due to this OIG analysis was based on two civilian investigators.

Expedited Investigations

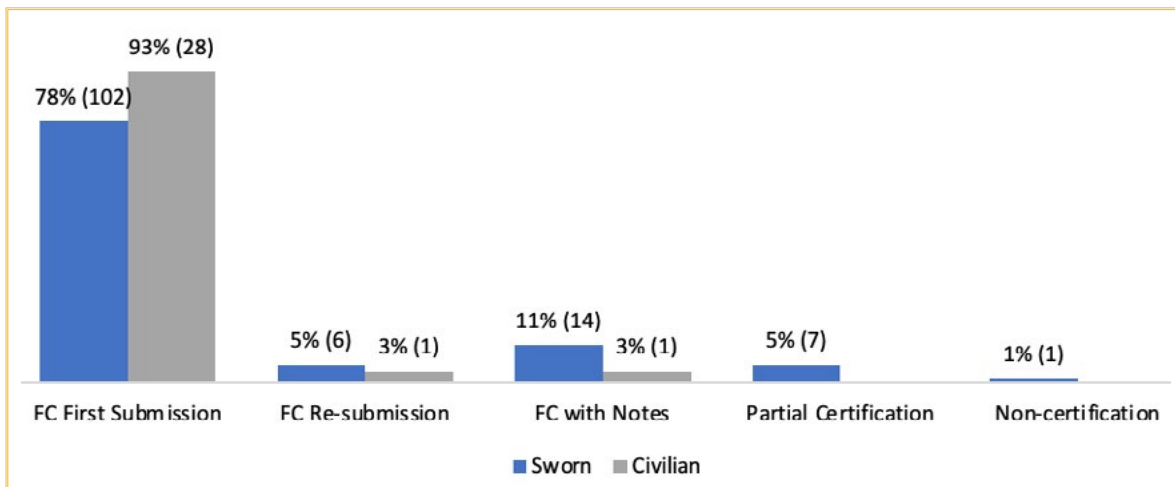
Expedited investigations are those where “[...] findings can be reached based on the intake investigation, and no further investigation needs to be included.”¹⁶ This type of investigation should not be utilized for cases where one or more of the following are present:

- A lack of video depicting relevant and material issues or fact or elements of the alleged misconduct.
- Multiple unrelated allegation types involving two or more named employees.
- Complex or confusing fact patterns.
- Cases involving matters of significant public concern.¹⁷

Figure 4 depicts the count and percentage of expedited investigations completed by OPA for complaints received between June 2022 and June 2023. According to OIG certification data, 30 expedited investigations were conducted by civilian investigators and 130 by sworn investigators. Compared to full investigations, the average number of cases completed by sworn and civilians was similar, with an average of fifteen expedited investigations per civilian investigator and 14.4 per sworn investigator.

Figure 4

Certification resolution of expedited investigations led by OPA staff



Source: OIG internal data. Note: Total cases were determined based on complaints received between June 2022 and June 2023. FC: Full Certification. Counts in parenthesis.

Certification. Civilian-led expedited investigations were fully certified after first submission 15% more often than those led by their counterpart. Only sworn-led expedited investigations were partially certified and non-certified.

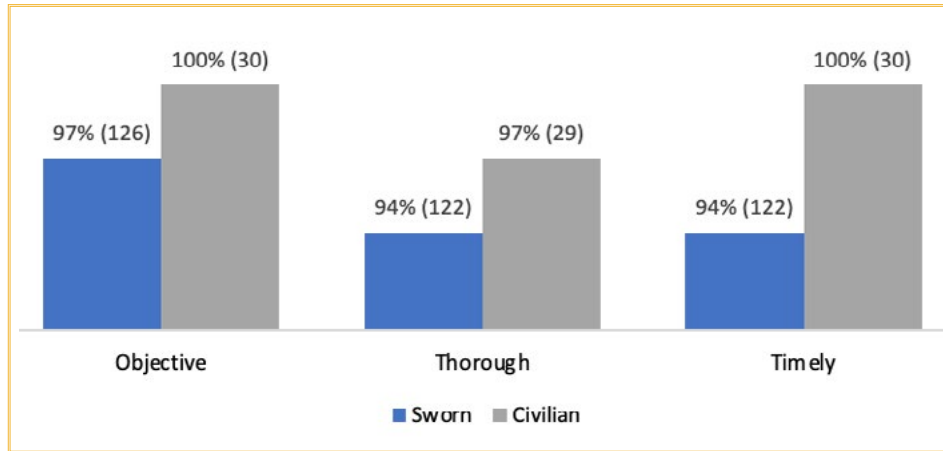
Figure 5 depicts the percentage and count of expedited investigations categorized by objectiveness, thoroughness, and timeliness. All civilian-led expedited investigations were found to be objective and timely.

16 OPA Internal Operations and Training Manual

17 *Id.*

Figure 5

Expedited Investigation: Percentage of cases by category and type of investigator



Source: OIG internal data. Note: Percentages based on total number of expedited investigations per type investigator. Counts in parenthesis

Notes/Deficiencies. Except for one note found on an expedited investigation conducted by a civilian investigator, all notes were found on cases led by sworn investigators. 18.5% of sworn-led investigations accrued a note. The missed allegations or missed statutory deadlines note types are expanded on below:

- Missed allegation.** According to the OPA Internal Operations and Training Manual, “A supervisor reviews the intake investigation and determines the specific allegations by assessing whether any laws or SPD policies would have been violated if the alleged actions are later proven to be true.”¹⁸ Thus, alleged misconduct is determined by civilian supervisors, and is not within the purview of sworn or civilian investigators.
- Missed statutory deadline.** OPA must notify the named employee(s) of a complaint within five business days of receipt of the complaint. OPA must also provide the employee and SPOG with a classification report no more than thirty days after receipt of the complaint by OPA. Six cases led by sworn investigators were partially certified due to missed deadlines; two were fully certified with notes.

Figure 6

Notes on expedited investigations conducted by Sworn investigators



Source: Based on OIG data. Percentage based on the total count of notes. Counts in parenthesis.

Next steps

The recently enacted city ordinance that governs how complaints made to OPA about the chief of police (COP) are conducted, further strains the limited civilian resources at OPA¹⁹. The ordinance requires an OPA civilian investigations supervisor to conduct the intake on COP complaints. When that intake is completed, a civilian OPA investigator can then conduct the investigation. OPA has two civilian investigations supervisors who each have a full workload without COP complaints on which to conduct intake. When complaints about the chief are high, as they have been, this requirement coupled with the limited civilian resources at OPA, can result in significant delays in the processing, investigation, and resolution of COP complaints. OIG will collaborate with OPA to review and address this issue.

Due to the differing criteria used by OIG and OPA, high staff attrition rates, SPOG restrictions on the role and number of civilian investigators, and the difference in complexity of investigations conducted by sworn and civilian investigators, comparison is challenging, and the sample size is limited. OIG will need another year of consistent staffing and data to make recommendations, if necessary. OIG will continue monitoring data and conduct literature reviews on this topic to further analyze OPA practices and use of sworn and civilian personnel to investigate allegations of police misconduct. OIG plans to work in collaboration with OPA to conduct a review of investigations in 2024.

¹⁹ Ordinance 126628.



Appendix A

Survey

Sworn & Civilian Staffing Survey

Calling national police departments about their staffing in investigations of alleged police misconduct

Introduction

The City of Seattle Office of Inspector General (OIG) is interested in studying police oversight practices and experiences related to use of sworn and civilian personnel to investigate allegations of police misconduct.

We will not identify individual respondents in any publications; however, we will be retaining notes of responses that are subject to public disclosure according to Washington state law. We will do our best to maintain the anonymity of respondents and de-identify data sources.

All questions are voluntary. If you do not wish to respond to a question, please indicate as such. Are you willing to proceed with this survey? It should take no more than 30 minutes.

Section 1: Identifying information about the police oversight entity

This section looks for structural information about the **oversight entity responsible for investigating police misconduct**. These questions aim to characterize the entity's level of independence in both authority and budget from the police department.

1. Name:	
2. Job title:	
3. Are you now or have you ever been a sworn law enforcement officer?	
<input type="radio"/> Sworn	
<input type="radio"/> Civilian, formerly sworn	
<input type="radio"/> Civilian	
4. Police Department:	
5. Police oversight entity name:	
6. Is your police oversight entity legally responsible for investigating allegations of police misconduct?	<input type="radio"/> No. Who does? <input type="radio"/> Yes
7. Is your police oversight entity legally established in the city charter or municipal code? (explain)	<input type="radio"/> No <input type="radio"/> Yes
8. Is the leadership in your oversight entity independent from the Police Department chain of command?	<input type="radio"/> No <input type="radio"/> Yes
9. Does your police oversight entity have its own budget (independent from the Police Department budget)?	<input type="radio"/> No <input type="radio"/> Yes

Section 2: Staffing composition

This section looks to describe **the composition of staff in charge of investigating police misconduct.**

<p>10. Which of the following best describes the composition of your police misconduct investigative staff?</p>	<p><input type="radio"/> Sworn only <input type="radio"/> Civilian only <input type="radio"/> Mix of Sworn and Civilian</p>
<p>11. Please provide counts of the numbers of sworn and civilian investigation Reviewers and investigation supervisors.</p>	
<p>12. Are there limitations on the civilian/sworn ratio?</p>	<p><input type="radio"/> No <input type="radio"/> Yes, why? <input type="radio"/> Collective Bargaining <input type="radio"/> Ordinance <input type="radio"/> Other,</p>
<p>13. Are there limitations for the civilian investigators or supervisors on the type of allegations they can review?</p>	<p><input type="radio"/> No <input type="radio"/> Yes, why? <input type="radio"/> Collective Bargaining <input type="radio"/> Ordinance <input type="radio"/> Other</p>
<p>14. If you have sworn officers, what is the length of the assignment?</p>	<p>From _____ up to _____ Other, _____</p>
<p>15. Have you ever transitioned from one structure to another, i.e., from sworn to civilian, civilian to sworn, or sworn to a mix of civilian and sworn staff?</p>	<p><input type="radio"/> No. <i>Are you planning to change [Y/N] and why?</i> _____ Please go to Section 3. <input type="radio"/> Sworn to a mix of civilian and sworn. Please go to Section 2.a. <input type="radio"/> Sworn to civilian. Please go to Section 2.a. <input type="radio"/> Civilian to sworn. Please go to Section 2.a. <input type="radio"/> Civilian to a mix of civilian and sworn. Please go to Section 2.a.</p>

Section 2.a: Transitions between staff composition

This section looks to gather information about changes in the composition of staff investigating allegations of police misconduct. Only respond to this section if your organization’s police oversight entity has had changes in the composition of its investigative staff.

16. What year did the change happen?	_____
17. What prompted the transition? (Describe)	<input type="radio"/> Collective Bargaining <input type="radio"/> Ordinance <input type="radio"/> Other, Describe: _____
18. Do you have any survey or other information related to how the perception of police accountability was affected by the inclusion of civilian investigators? (Describe)	<input type="radio"/> No <input type="radio"/> Yes

Section 3: Characteristics and qualifications of investigative staff

This section looks to describe the **characteristics and qualifications** of sworn and civilian staff that conduct investigations into allegations of police misconduct.

19. What are the required qualifications for sworn personnel that investigate police misconduct?	
20. What are the required qualifications for civilian personnel that investigate police misconduct? OR REVIEW INVESTIGATIONS OF POLICE MISCONDUCT	
21. What is the hiring process for sworn and civilian investigators, INVESTIGATION REVIEWERS, SUPERVISORS?	
22. Please describe what (if any) differences you have observed between the skillsets of sworn and civilian personnel investigating police misconduct?	
23. Please describe what (if any) differences you have observed between the performance of sworn and civilian personnel investigating police misconduct?	

Section 4: Perception of the police accountability

This section looks for your opinion about the perception from the different police-accountability stakeholders.

24. Please describe any differences investigation-supervisors perceive between sworn and civilian staff conducting investigations into alleged police misconduct? (Describe)	
25. In your opinion, are certain types of personnel (sworn or civilian) better at investigating certain types of police misconduct allegations? If so, why?	
26. In your opinion, what benefit is there (if any) to the police accountability system having civilians or a mix of civilian/sworn staff conducting investigations of alleged police misconduct? (Describe)	

Appendix B

Table 1. Full Investigations

OPA Allegation Category	Inv	Certification	Notes/Deficiencies
Vehicle Operation Video & Recording Conformance to Law	c	Full Certification	
	s	Full Certification	Thorough
Force: De-escalation Professionalism	c	Full Certification	
	s	Full Certification after resubmission	
	s	Full Certification	Thorough
Investigation & Reports Professionalism Stops, Detentions & Arrests Vehicle Operation Video and Audio Recording Force: Investigation Force: Reporting	c	Full Certification	
	s	Full Certification	
	s	Full Certification	
Bias-Free Policing Investigations & Reports Professionalism	c	Full Certification	Timely
	s	Full Certification	Timely
	s	Full Certification with notes	
	s	Full Certification	Timely
Integrity & Ethics Conformance to Law Administrative Procedure Professionalism	c	Full Certification	Thorough
	s	Full Certification with notes	Thorough
	s	Full Certification after resubmission	
	s	Full Certification	
Conformance to Law Courtesy & Demeanor Professionalism	c	Full Certification	Thorough
	s	Full Certification	Thorough
Discretion & Authority Stops, Detentions & Arrests Conformance to Law Professionalism	c	Full Certification	
	s	Full Certification	
	s	Full Certification	
Bias Free Policing Professionalism Conformance to Law	c	Full Certification	Objective timely
	s	Full Certification after resubmission	
	s	Full Certification with notes	Objective
	s	Full Certification with notes	
	s	Full Certification with notes	
	s	Full Certification	Thorough
Conformance to Law Force: Reporting Performance of Duty Professionalism Integrity & Ethics	c	Full Certification	
	s	Full Certification after resubmission	
	s	Full Certification with notes	Thorough

Appendix B continued

Table 1. Full Investigations			
OPA Allegation Category	Inv	Certification	Notes/Deficiencies
Conformance to Law Investigations & Reports Stops, Detentions & Arrests	c	Full Certification	
	s	Full Certification	
Bias-Free Policing Search & Seizure Conformance to Law	c	Full Certification	
	s	Full Certification after resubmission	
Integrity & Ethics Investigations & Reports Video & Audio Recording Professionalism	c	Full Certification	Thorough timely
	s	Full Certification after resubmission	
	s	Partial Certification	
	s	Full Certification	

Appendix. C

Full Investigations

- Crosstabulation

		Investigator		
		Civilian	Sworn	Total
Certification with Notes	Yes	5	15	20
	No	7	12	19
	Total	12	27	39

- Pearson's Chi-square test

		Investigator	
		Expected Count	Sworn
Certification with Notes	Yes	6.15	13.84
	No	5.84	13.15
Chi-square Statistic: 0.2059, p-value= 0.6499			

Expedited Investigations

- Crosstabulation

		Investigator		
		Civilian	Sworn	Total
Full Certification 1 st Submission	Yes	2	28	30
	No	28	102	130
	Total	30	130	160

- Pearson's Chi-square test

		Investigator	
		Expected Count	Sworn
Full Certification 1 st Submission	Yes	5.625	24.375
	No	24.375	105.625
Chi-square Statistic: 2.6298, p-value= 0.1048			

Appendix. D

Acronyms, initialisms, abbreviations, and definitions

COP: Chief of Police

DOJ: Department of Justice

OIG: Office of Inspector General

SPD: Seattle Police Department

SPMA: Seattle Police Management Association

SPOG: Seattle Police Officer Guild

Certification after re-submission: Any type of certification provided by OIG (full certification, full certification with notes, partial certification, or non-certification) after any further investigation conducted by OPA.

Expedited investigation: Those where “[...] findings can be reached based on the intake investigation, and no further investigation needs to be included.”²⁰ This type of investigation should not be utilized for cases where one or more of the following are present: A lack of video depicting relevant and material issues or fact or elements of the alleged misconduct, multiple unrelated allegation types involving two or more named employees, complex or confusing fact patterns, cases involving matters of significant public concern.²¹

Full certification with notes: Type of certification provided by OIG where investigation is thorough, objective, and timely. This type of certification includes annotations related to issues encountered in the investigation.

Full certification: Type of certification provided by OIG where investigation is thorough, objective, and timely.²²

Full investigation: A traditionally investigation of cases²³. Investigation may include interviewing the complainant and involved officer(s), identifying, and interviewing independent witnesses, as well as collecting and reviewing additional evidence.

Non-certification: Type of certification provided by OIG where investigation is not thorough and objective, along with any requested or directed further investigation to be conducted by OPA.²⁴

Notes: Annotations related to the thoroughness, timeliness, and objectivity of cases. Notes are not significant enough to impact the certification of a case.

Objectivity: Relevant evidence is neutrally and accurately assessed and characterized. This includes an assessment of whether conflicting testimony has been addressed, and facts and analysis are conveyed in a manner that does not express bias.²⁵

Partial certification: Type of certification provided by OIG where one or two of thorough, timely, and objective are not fully certified.²⁶

Thoroughness: Each allegation has been addressed, and information gathered is reasonably sufficient to decide regarding findings.²⁷

Timeliness: OPA has met all contractual and statutory timelines.²⁸

20 OPA Internal Operations and Training Manual

21 *Id.*

22 OPA 2022 Annual Report

23 *Id.*

24 *Id.*

25 OIG 2019 Annual Report

26 OPA 2022 Annual Report

27 OIG 2019 Annual Report

28 *Id.*