

SEATTLE POLICE ACCOUNTABILITY & CIVILIAN OVERSIGHT



FROM THE OFFICE OF MAYOR EDWARD B. MURRAY

SUMMARY

The people of Seattle are strongly committed to robust and effective civilian oversight of the police accountability system. Over the past two decades, our unique system of civilian oversight has developed and evolved in response to high-profile incidents in a manner that created a layered process with significant duplication, inefficiency, and confusion.

In the last nine months, the Mayor's special advisor for police issues, Dr. Bernard Melekian; the Community Police Commission (CPC); and the Office of Professional Accountability (OPA) Auditor have all conducted reviews and made recommendations for reform of the civilian oversight and police accountability system. Those recommendations were the result of a remarkable collaborative effort and form the basis of Mayor Edward B. Murray's plan for improving the police accountability system:

- 1 Make the CPC the permanent civilian oversight body of the police accountability system.
- 2 Consolidate review of individual OPA cases under the OPA Auditor and incorporate other functions of the OPA Review Board into the CPC.
- 3 Strengthen the role and independence of OPA
- 4 Implement key policy and process reforms to the accountability and discipline processes in order to maximize professionalism, transparency and public trust.
- 5 Study whether to establish an independent Office of Inspector General for the Seattle Police Department (SPD) to help identify structural and programmatic weaknesses within the Department and institute national best practices.

#1

Make the Community Police Commission the permanent oversight body of the police accountability system

The Community Police Commission (CPC) was created in 2012 under the Memorandum of Understanding between the City and United States Department of Justice (DOJ) in connection with the Settlement Agreement. It was then formally established by Executive Order 02-2012 and Ordinance 124021. CPC's principal function is to be a forum for community input into the implementation of the DOJ Settlement Agreement and the CPC was also asked to provide its input into recommendations for improvements to police accountability and select police policies.

Since its inception, the CPC has become an important and powerful voice for the community on police reform. It includes representatives from Seattle's many diverse communities and police labor unions and has earned those communities' trust. It has also earned the respect of the SPD and police oversight community leaders. CPC's reputation and legitimacy within the community should be preserved and strengthened. Under the Mayor's proposal, CPC will become a permanent fixture of the City's police accountability system.

In this permanent role, the CPC will continue to be an independent, civilian body that represents the community's values and ensures that the City's police accountability system is effective, open, accessible, fair and transparent. Critically, it must be viewed by the community and police officers as having legitimacy. That legitimacy depends on it being broadly representative, deeply knowledgeable and highly skilled in finding ways to meet the needs of many diverse interests. The current design of CPC satisfies these basic requirements:

- CPC's members are drawn from communities that have had difficulties in their interactions with SPD, including different racial and ethnic groups, youth, LGBT communities, individuals who have mental illness and substance abuse disorders, and community members who serve or work with people who are homeless.
- CPC also includes a representative of the Seattle Police Officers Guild and a representative of the Seattle Police Management Association, as well as representatives from the faith and business communities.

Under the Mayor's proposal, CPC's new role will be to (1) ensure the independence and comprehensiveness of civilian oversight; (2) assess the overall performance of the police accountability system and OPA, including the OPA Auditor; (3) propose or comment on proposed changes to the police accountability system; and (4) review the implementation of changes to the police accountability system by OPA, the OPA Auditor, and SPD.

CPC's police accountability responsibilities will include:

- Recommending candidates to the Mayor for appointment to the roles of OPA Director and OPA Auditor, respectively, and advising on their re-appointment or removal for cause;
- Annually reviewing the performance of the OPA Director and OPA Auditor and publicly evaluating them after obtaining community and Department perspectives on their performance;
- Meeting with the OPA Director and OPA Auditor quarterly to review information concerning SPD's performance, their own performance and the performance of their offices;
- Reviewing any policy reports and recommendations of the OPA Director and OPA Auditor;
- Holding meetings for SPD and City policy-makers to provide status updates on the implementation of recommendations for improvements made by the OPA Director, OPA Auditor and others;
- Convening an annual meeting to review the overall effectiveness of the accountability system;
- Reviewing and commenting on any proposed revisions to SPD's accountability system, including processes that intersect with the employee performance management system and the disciplinary system;
- Commenting on proposed revisions and providing input on any major changes to the OPA Operations and Training Manual and to the provisions of SPD's Policy Manual relating to the accountability system;
- Serving as an advisory council to the OPA Director and OPA Auditor, identifying problems and recommending improvements to the accountability system;
- Engaging in extensive community outreach related to community and SPD officer perspectives on the accountability system;
- Consulting on the development and distribution of educational materials related to public interface with the accountability system;
- Collaborating with SPD, the OPA Director and the City Attorney's Office in improving system transparency, specifically updating public disclosure procedures and providing for online posting of information about the status of investigations and their outcome.

CPC's current role providing community input into the implementation of the Settlement Agreement and certain other police issues will remain unchanged.

#2

Consolidate case review of OPA investigations under OPA Auditor and incorporate other functions of OPA Review Board into CPC

The civilian OPA Auditor and OPA Review Board are currently responsible for reviewing OPA case investigation files. The OPA Review Board has served an important civilian oversight role over the years and has historically had four responsibilities: (1) to review OPA's complaint handling process by reviewing OPA complaint forms and closed OPA complaint files; (2) to organize and conduct public outreach; (3) to advise the City on SPD policies and practices related to police accountability and professional conduct; and (4) to recommend topics for review by the OPA Auditor.

The OPA Review Board's first responsibility is already played by the OPA Auditor under the current structure. It is the opinion of Dr. Melekian, the CPC, the OPA Auditor and others that the current case-review system should be streamlined. The Mayor's proposal recognizes that the individual case-review function should rest with an independent civilian that has the technical expertise, capacity, and background to fully review investigation case files for quality and thoroughness. The civilian OPA Auditor is uniquely designed to play that role and will continue to do so. In light of this function of the OPA Auditor, CPC and the OPA Auditor agree that the additional case-review function performed by the OPA Review Board has become unnecessary. The Mayor's proposal accepts this recommendation.

The DOJ Memorandum of Understanding establishing CPC states: "the Commission will not review or report on specific cases of alleged misconduct, review or comment on discipline, and will not seek to influence the course or outcome of a specific complaint investigation or the discipline of specific officers. The Commission will not have access to any non-public information regarding an individual police officer or allegation of misconduct or disciplinary action." Consistent with the DOJ Memorandum of Understanding and the recommendation of CPC, the CPC will not be responsible for review of any individual OPA cases. That individual case-review function will be the role of the civilian OPA Auditor.

The OPA Review Board's remaining three responsibilities will be integrated into the CPC. In addition, the CPC membership will be expanded to include up to three (3) additional seats for OPA Review Board members that desire to join the CPC and are appointed by the Mayor and confirmed by Council.

#3

Strengthen the role and independence of OPA

Under the leadership of Seattle Police Chief Kathleen O'Toole and OPA Director Pierce Murphy, relations between SPD and OPA are functioning well with clear lines of separation and cooperation. That relationship – independence and partnership – needs to be formalized in both legislation and agreement. A combination of legislation and memorandum of understanding between the Chief of Police and the OPA Director will accomplish the following:

- Affirm SPD's commitment to provide the OPA Director with additional direct input into staffing selection and greater staffing continuity;
- Affirm OPA's authority to initiate misconduct investigations;
- Establish a protocol for SPD and OPA response to high-profile incidents;
- Provide greater budgeting authority to OPA;
- Establish clear guidelines to ensure that OPA investigations and the Chief's review of OPA findings are carefully tracked and occur in a timely manner that does not foreclose any disciplinary or investigatory options;
- Collaborating with SPD, the OPA Director and the City Attorney's Office in improving system transparency, specifically updating public disclosure procedures and providing for online posting of information about the status of investigations and their outcome.

In the past several months, many steps have already been taken to strengthen the independence of OPA. Specifically, in July 2014, OPA finalized — and the Federal District Court approved — the OPA Internal Operations and Training Manual. The 63-page 'OPA Manual' establishes clear standards for OPA's handling of: complaint in-take, call-outs, investigations, case management, appeals, criminal referrals, and training. The OPA Manual codifies a number of the CPC's April 2014 recommendations.

In practice, these efforts are already bearing fruit. The Chief and OPA Director have worked to provide the public with information on high-profile incidents of potential misconduct in a transparent and timely fashion. The Chief has also made clear that the days of missed deadlines foreclosing discipline options are over. The Chief has directed that SPD carefully track all cases to make sure nothing falls through the cracks, and the Mayor has directed the Chief to formalize those internal procedures.

To further strengthen these internal processes, the Chief has bolstered the SPD's legal team with the appointment

of an SPD Senior Counsel and assignment of an Assistant City Attorney to be legal advisors to the Chief and her command staff on a variety of issues, including discipline matters.

Lastly, the OPA Director and CPC have identified a need for additional capacity to educate community groups about the OPA complaint process and work directly with complainants who may need assistance in navigating the OPA complaint process. The Mayor agrees that those functions are important to the success of the accountability system and will propose additional funding to provide OPA with a complaint navigator position in 2015.

#4

Implement key policy and process reforms

In April 2014, the CPC provided a list of 55 recommendations for policy and process reforms to improve the operation and transparency of the accountability system. In the past five months, SPD implemented a number of those recommendations and established them as policy. Implementation of additional recommendations are in progress or under review. The attached Appendix includes a specific response to all 55 recommendations.

Most notably:

- **New SPD Policy Manual Sections on Conduct:** In July 2014, the Federal District Court approved new SPD Policy Manual sections 5.001 and 5.002 related to the standards and duties of officers, and the handling of complaints against officers, respectively. As recommended by the CPC, these new policies clearly establish the Department's expectations for officer and employee conduct and community care-taking.
- **New OPA Manual:** Also in July 2014, the Federal District Court approved the first ever OPA Manual. It establishes clear protocols for complaint in-take and investigation, as well as criminal referrals and appeals. Importantly, the OPA Manual also requires regular contact with complainants about the status of the investigation of their cases.
- **Personnel and Policy Improvements:** In June 2014, Mayor Edward B. Murray appointed Kathleen O'Toole as Chief of Police. In her four months on the job, Chief O'Toole has brought on key civilian personnel with significant expertise in recruitment, training, management and supervision. Under the Chief's leadership, the Department has initiated a variety of efforts to improve every aspect of its performance.

In total, the Mayor's Office, SPD, OPA Auditor and OPA Director have reviewed every one of the CPC's 55 recommendations and taken action:

- 22 recommendations have been **Implemented**;

- 12 recommendations have implementation **In Progress**;
- 15 recommendations are **Under Review**; and
- 6 recommendations have been **Reviewed and Action Taken** but the action may differ in some respect from the precise action recommended by the CPC.

Certain elements of the Mayor's proposal must be implemented through legislation. The Mayor intends to introduce relevant legislation to Council in early 2015 after further consultation and collaboration with Councilmembers, the City Attorney's Office, the CPC, the Federal Monitor, and the Department of Justice. Other steps to implement the plan have or will be taken through Executive action or cooperation with the City Attorney's Office, as discussed further in the Appendix.

In 2015, the City will also be entering into labor negotiations with its police unions, the Seattle Police Officers' Guild (SPOG) and the Seattle Police Management Association (SPMA). The Mayor intends for the City to address a number of high-priority operational and accountability issues during those negotiations.

#5

Study the creation of an Office of Inspector General

As Dr. Melekian stated in his June 2014 accountability report, "there is a strong need for an overarching system of audits and inspections in the SPD." Dr. Melekian proposed as a solution the creation of an Office of Inspector General that would conduct audits and oversight over all department functions with the aim of finding weaknesses and instituting best practices. This approach has been instituted with the Los Angeles and New York police departments and is a model worth studying.

At the same time, Chief O'Toole has made improving business practices one of her top four priorities for the Department. To make that happen, she has brought in a civilian Chief Operating Officer — Michael Wagers — and given him broad authority to reform SPD's business practices (human resources, finances, contracting, and technology), hired a Senior SPD Counsel, and embedded an Assistant City Attorney and legal assistant into the discipline process at SPD. While Chief O'Toole and Mr. Wagers push to make SPD more efficient and effective, the Mayor has asked Dr. Melekian to further study the concept of the Office of Inspector General and determine how it would be implemented in Seattle under the Department's new leadership.

APPENDIX

Status and response to CPC recommendations

CPC #	CPC RECOMMENDATION	STATUS	NOTE
1	The Department's standards and values should support a robust and legitimate accountability system	IMPLEMENTED	SPD Manual 5.002-POL was revised in July 2014 to provide a clear statement of the Department's support for the accountability system: "The purpose of these procedures is to provide a prompt, just, and open disposition of complaints regarding the conduct of employees. To this end, the department welcomes criticism of department procedures and complaints against its employees from members of the public. The department considers all complaints against the agency and any of its employees and fully investigates all such complaints as appropriate."
2	The Department should adopt hiring preference points for skills needed in current policing	UNDER REVIEW	Chief O'Toole has directed COO Mike Wagers and Deputy Chief Carmen Best to conduct a review of how to make improvements to the hiring process in line with this recommendation. Chief O'Toole has made numerous public statements regarding her desire to make sure SPD recruits new officers with a community care-taking ethos.
3	The Department's professionalism policy should articulate expectations consistent with community care-taking	IMPLEMENTED	SPD Manual 5.001-POL now states: "The Department encourages all employees to treat all people with dignity; remember that community care-taking is at times the focus, not always command and control; and that the guiding principle is to treat everyone with respect and courtesy..."
4	The Department's professionalism policy should include a conduct unbecoming policy	IMPLEMENTED	SPD Manual 5.001(9) now states: "Regardless of duty status, employees may not engage in behavior that undermines public trust in the Department, the officer, or other officers."
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	IMPLEMENTED	SPD Manual 5.001(9) now states: "Any time employees represent the Department or identify themselves as police officers or Department employees, they shall not use profanity directed as an insult or any language that is derogatory, contemptuous, or disrespectful."

APPENDIX: STATUS AND RESPONSE TO CPC RECOMMENDATIONS

CPC #	CPC RECOMMENDATION	STATUS	NOTE
6	There should be additional community-based channels for complaint filing	IN PROGRESS	The new OPA Manual, approved by the Court on 7/16/14, states: "OPA will attempt to enter into agreements with City referral agencies and any community organizations that make referrals as necessary to ensure that complaints are properly referred." OPA will undertake this process in consultation with the CPC and community groups.
7	The Department's Public and Internal Complaint Process policy (SPD Policy Manual 5.002) should be revised	IMPLEMENTED	Significant revisions to SPD Manual 5.002 were submitted to the Court and approved on 7/16/14.
8	The Department should establish a public response protocol for major or high profile incidents	IN PROGRESS	Mayor Murray has directed SPD and OPA to agree on a new memorandum of understanding and establish a protocol for public response to high-profile incidents involving alleged officer misconduct. This protocol will be informed by CPC's specific recommendations on this point. In addition, as demonstrated in the past 4 months, Chief O'Toole has ordered the proactive and timely release of information on all cases involving serious alleged misconduct.
9	The City Attorney's Office should ensure impartial practices in SPD's public disclosure processes	IN PROGRESS	Chief O'Toole has identified significant challenges with SPD's current public disclosure practices and COO Mike Wagers has convened a working group with the City Attorney's Office and DoIT to adopt new technologies and best practices for greater public transparency.
10	Materials should describe appellate and grievance review	IN PROGRESS	OPA Manual II provides a diagram of the appellate and grievance processes. In addition, in consultation with the CPC, OPA is revising its brochures, website, and other public materials to provide greater clarity on the accountability and discipline system.
11	OPA should increase the frequency of communications with complainants and named employees	IMPLEMENTED	The new OPA Manual II.C.11 states that "OPA investigators shall make contact with the complainant(s) and named employee(s) at least once every 30 calendar days.... This contact must include information about the current status of the investigation."

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12	OPA should provide a mechanism for tracking status of complaints online	UNDER REVIEW	In consultation with the CPC, OPA is reviewing the potential requirements and cost of creating an online tracking tool for secure complainant and employee access to case status information.
13	OPA should post results of investigations and alternative resolutions online	IN PROGRESS	OPA will soon begin posting a summary of investigations online following the Chief's final determination. OPA is currently developing the protocols for how that is achieved in compliance with privacy requirements. OPA will consult with the CPC on those proposed protocols. In addition, new OPA Manual IV states: "The OPA Director also issues reports on an ongoing basis summarizing closed investigations, OPA complaint trends in comparison to the same period the previous year, and information about cases referred to the OPA Mediation Program."
14	OPA should post results of appeals and grievances online	IN PROGRESS	Once OPA has received information regarding the outcome of an appeal or grievance (as discussed below), OPA will update its online posting (as discussed above) with this additional information.
15	The Chief of Police should be required to notify the Mayor, Council, OPA Director, and OPA Auditor when findings are modified due to the outcome or settlement of an appeal or grievance	IMPLEMENTED	The Mayor has directed SPD to notify the Mayor, Council President, Chairperson of the Public Safety Committee, OPA Director, and OPA Auditor when any sustained findings are modified or overturned due to settlement or appeal or grievance. These notification procedures will be further memorialized in legislation.
16	OPA jurisdiction should be expanded	IN PROGRESS	OPA's authority includes the ability to initiate any investigation regarding potential misconduct, and this will be memorialized in future legislation.
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	UNDER REVIEW	Section 3.6.B.2 of the SPOG Collective Bargaining Agreement currently provides for tolling of the 180-day time limit when there is a criminal investigation of alleged police misconduct. The Mayor's Office has directed further review of OPA investigation time limit issues, some of which may be subject to labor negotiation.
18	OPA should be given administrative subpoena power	REVIEWED AND ACTION TAKEN	The OPA Director has reviewed the recommendation and determined that administrative subpoena power is not necessary for OPA to effectively perform its duties.

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19	Establish rapid adjudication process for certain types of alleged misconduct	UNDER REVIEW	This recommendation may be subject to labor negotiation.
20	The Department should establish an informal problem-solving process for certain “customer-service” types of complaints	IN PROGRESS	Seattle Police Manual 5.002(5) now states: “Supervisory employees shall fully investigate and take corrective action, within the scope of their authority, when they witness or receive allegations of employee misconduct related to [certain low-level misconduct like rudeness].” All other misconduct is reported through the chain of command to OPA. OPA may, at its discretion, refer those complaints are allegations back to the appropriate supervisor for supervisory investigation and action.
21	The Department should improve its mediation and other alternative resolution processes	UNDER REVIEW	There is widespread agreement that OPA’s mediation and alternative resolution processes should be improved. OPA is reviewing options to improve this program and will consult with experts and the CPC on how to do so.
22	Certain SPD internal investigations should be streamlined	IMPLEMENTED	A policy directive consolidating review of officer involved shooting under the Use of Force Review Board has been negotiated with SPOG and approved by SPD. It is now pending Monitor and Court approval.
23	The Department should establish a protocol for investigation of allegations against OPA staff	IMPLEMENTED	OPA Manual II.P establishes protocols for handling complaints against OPA staff.
24	OPA should make training referrals an option in Sustained cases rather than a separate finding	IMPLEMENTED	OPA Manual II.L.4 provides that training can be an appropriate response for both sustained and not sustained findings. Training referrals are no longer a separate finding.
25	OPA should add a provision for “Department Management, Policy or Training Correction Required”	REVIEWED AND ACTION TAKEN	OPA Manual II.L.1 states that for not sustained findings, OPA may communicate to the Department and to the public that “the investigation brought out the need for department level changes or improvements to SPD policy, training, supervision, etc.” In addition, OPA Manual III states: “The OPA Director and the OPA Auditor each have the authority to make policy, training or procedure recommendations to SPD.”

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CPC #	CPC RECOMMENDATION	STATUS	NOTE
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	REVIEWED AND ACTION TAKEN	The OPA Director is able to recommend that the Chief meet with a complainant or other witnesses in an investigation. The determination as to whether to meet with a complainant will rest with the Chief.
27	The Department should revise practices related to staffing to support OPA effectiveness	IN PROGRESS	Staffing continuity for sworn personnel will be memorialized in legislation and a memorandum of understanding between the Chief and OPA Director.
28	The Department should employ civilian staff in its OPA precinct liaison program	UNDER REVIEW	This recommendation may be subject to labor negotiation.
29	The Department should use a discipline matrix to better ensure uniformity	UNDER REVIEW	This recommendation may be subject to labor negotiation.
30	The Department should maintain a tracking tool to maintain records of disciplinary determinations	IN PROGRESS	Chief O'Toole has stated her commitment to ensuring consistent and fair discipline across cases. SPD has hired a SPD Senior Legal Counsel who will have responsibility for collecting and tracking disciplinary decisions and results, and advising the Chief on disciplinary decisions. In addition, the City Attorney's Office will assist with this process.
31	Time limits should be established on certain steps following completion of OPA investigations	UNDER REVIEW	This recommendation may be subject to labor negotiation.
32	The role of SPOG in investigations should be to ensure contractual and due process rights	IMPLEMENTED	OPA Manual II.G.2 now clearly delineates the role of a union representative during an OPA interview.
33	Discipline should be imposed and implemented upon the Chief's final decision, not delayed pending a grievance or appellate process	IMPLEMENTED	Current practice is for discipline to be imposed upon the Chief's determination.
34	The grievance process should be exclusively used to review challenges based on contract violations	UNDER REVIEW	This recommendation may be subject to labor negotiation.

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CPC #	CPC RECOMMENDATION	STATUS	NOTE
35	There should be one avenue for disciplinary appeals through the Public Safety Civil Service Commission	UNDER REVIEW	This recommendation may be subject to labor negotiation.
36	Public Safety Civil Service Commission members should be impartial parties with appropriate expertise	UNDER REVIEW	This recommendation may be subject to labor negotiation.
37	The chair of the Public Safety Civil Service Commission should be a City hearing examiner	UNDER REVIEW	This recommendation may be subject to labor negotiation.
38	Appellate hearings after the Chief of Police disciplinary determination should be in public	UNDER REVIEW	This recommendation may be subject to labor negotiation.
39	Notice of appeals should be provided to the City Attorney's Office	IMPLEMENTED	SPD will immediately notify the City Attorney's Office after receipt of a notice of appeal.
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	REVIEWED AND ACTION TAKEN	The OPA Auditor will be notified of appeal or grievance filings related to discipline involving officer misconduct. The OPA Auditor's role will not be formally expanded to require the Auditor's input into the decision-making process on how the appeal should be handled because that is the role of the Department and City Attorney's Office.
41	The City Attorney's Office should provide timely notice of appeal results to OPA	IMPLEMENTED	The Mayor has asked the City Attorney's Office and SPD to provide timely notice of appeals and appeal results to OPA, the OPA Auditor, the Council President, the Public Safety Committee Chair, and the Mayor's Office.
42	Improved policies and practices should be instituted concerning how modifications, appellate strategies and settlement decisions of disciplinary cases are made	IMPLEMENTED	If a final determination of discipline by the Chief is appealed, the City Attorney's Office will represent the Department in the hearing or arbitration. The City Attorney's Office will only consider settlement of an appeal, in consultation with the Chief, where there is a legal and/or factual cause to do so and settlement is in the best interests of the Department and City.

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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	UNDER REVIEW	OPA Policy Manual II.N provides that the Chief will send notification of an employee's termination to the Washington State Criminal Justice Training Commission. The proposal to broaden the grounds for license revocation by the WSCJTC would require State legislative action. The Mayor's Office will examine the feasibility and impact of this proposal.
44	Department data systems should document all relevant information related to cases	IMPLEMENTED	OPA had adopted the software system IAPro for all OPA case management. In 2015, SPD will be developing a more comprehensive data analytics platform (business intelligence system) that may incorporate OPA case management tools. The SPD Senior Counsel and City Attorney's Office will fully document all timelines and decision-making by the Chief and command staff.
45	The Department should establish a protocol to ensure regular review of litigation and other observations and cases to improve training, hiring or policies	IN PROGRESS	COO Mike Wagers and the Compliance Bureau will consult with the City Attorney's Office regarding litigation patterns and ways to improve training. SPD has hired a senior legal advisor to with this process.
46	The City Attorney's Office should assess arbitrator rulings and propose improvements	IMPLEMENTED	The Mayor has requested that the City Attorney's Office provide a regular review of arbitrator rulings in order to make improvements to this part of the accountability system.
47	The City should establish a system to ensure responsiveness to recommendations to improve accountability	IMPLEMENTED	The Mayor's proposal establishes the CPC as the permanent oversight body for police accountability and makes them responsible for tracking accountability recommendations and follow-through. The Mayor has directed SPD to timely respond to additional accountability recommendations going forward.
48	The City Attorney's Office should alert OPA of issues raised due to a grievance or appeal that suggest practice improvements	IMPLEMENTED	OPA and the City Attorney's Office have agreed to share information and recommendations on practice improvements to ensure that practice issues raised during an appeal do not go unaddressed.

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49	The OPA Auditor should analyze the appropriateness of discipline imposed in prior cases	REVIEWED AND ACTION TAKEN	The Senior SPD Counsel and City Attorney's Office will advise the Chief on police discipline matters. They will collect, review, and analyze prior discipline decisions to ensure appropriateness and consistency for future discipline determinations.
50	The Department should discontinue "extended authority commissions"	IMPLEMENTED	Extended Authority Commissions for retired officers are being discontinued.
51	The Department should create an internal, civilian office for management and oversight of secondary employment work	UNDER REVIEW	This recommendation may be subject to labor negotiation.
52	The Department should revise its In-Car Video review policy to allow for its use in training and coaching	IMPLEMENTED	Department policy allows In Car Video to be reviewed for use in training and coaching.
53	The Department should retain holding cell video for 90 days	IMPLEMENTED	All holding cell video is being retained indefinitely at this time per instructions from the Monitor. COO Mike Wagers is currently conducting a review, discussed above, regarding the retention and public disclosure of holding cell and ICV video that will permanently implement this recommendation.
54	Reports describing results of investigations should include changes made as a result of appeals or grievances	IN PROGRESS	The Mayor has directed the OPA Director to include changes to the outcome of cases from appeals or settlements in OPA's public reporting on those cases.
55	The City Attorney's Office and the City's Personnel Division should provide the OPA Auditor quarterly reports and information on challenged cases	REVIEWED AND ACTION TAKEN	The City Attorney will notify the OPA Auditor, among others, regarding the results of any settlement or appeal that changes the findings and/or discipline imposed by the Chief.