Seattle Community Police Commission

January 9, 2019

VIA EMAIL

Dear Executive Director Boatright,

By way of this letter, the Community Police Commission (CPC) submits its feedback and questions on the disparity audit methodology submitted by the Seattle Police Department (SPD) to the Monitoring Team and the Department of Justice on October 31, 2018 as part of the Sustainment Plan. The CPC identified this audit as a priority area for review on its 2018 work plan. For this reason, the CPC engaged Dr. Jerald Herting, a professor of the University of Washington Department of Sociology, to review the methodology and the CPC's feedback and questions are informed by Dr. Herting's review.

The CPC appreciates the opportunity to provide feedback and be in conversation with SPD as this methodology took shape over the past few months. The Propensity Score Matching (PSM) method of analysis, as proposed in this latest iteration of the disparity audit methodology, seems like a logical choice for the audit; however, the CPC has a few questions, some stemming from concerns regarding the methodology.

1. Given that using the PSM methodology to produce a reliable assessment of disparity (or lack thereof) in outcomes relies on the success of prediction and matching, one concern the CPC has is the need for substantial overlap in characteristics between those in the targeted treatment group and those in the group used as the control. If there are gaps in the array of predictors where one group has few matches or few characteristics that coincide, then the matching process can breakdown. For example, in some Seattle spatial locations of stops there may be few individuals other than black individuals which then makes it difficult to find similar non-black matches. To work well, the PSM method requires overlap. With restricted overlap the observed "difference" due to treatment fails to address the full population and the difference observed may represent only a subgroup of individuals.

   Given the importance of adequate matching in the Propensity Score Matching methodology, how does the SPD plan to demonstrate that adequate matching has occurred (i.e. is the matching reasonable enough to interpret observed difference, lack of difference, the effect of treatment (effect of race)?

2. If the above matching is, in fact, suspect or partially suspect in its full range for the population how will SPD address this problem? In other words, if there is insufficient overlap in the matching process, what is the plan to address this problem?

3. Will only one form of matching (weighted observation matching) be used? Will there be any sensitivity checks to the results that may help provide confidence in the observed results under PSM method?

4. Given that the issue of matching is a significant area of concern for the CPC, would SPD be willing to assure and demonstrate to the Commission that an adequate assessment of the matching will be evaluated—outlining how and addressing potential alternatives if matching is not satisfactory?

5. How will SPD define "white" subjects in the analysis? The methodology states that SPD will focus on racial disparity between two matches: (1) subjects perceived to be white and non-white, and (2) subjects perceived to be white and black. Is there a plan to use Hispanic Surname Analysis to estimate the percentage of those individuals categorized as white who are Latino/a/x?

6. The SPD proposed data set and the extant characteristics for events, persons stopped, and officers are substantial. There is, however, one potential gap in characteristics that seems important to assess directly or by proxy. There is an evident gap in assessing the socioeconomic status (SES) of the person stopped. The SPD memorandum itself points to this important feature in justice contacts as it states, "Other studies point to poverty as the highest factor," and yet the potential matched factors proposed are somewhat unlikely to tap fully this SES/poverty feature for matching. Not accounting for this feature may lead to poor matches and end up inaccurately estimation of a race difference.

   Given the apparent lack of information in the provided tables on the SES of individuals stopped by the police and the acknowledged role SES plays in the criminal justice system (i.e. policing, courts, individual illegal behavior) how might the SPD incorporate additional information capturing this factor? For example, is it possible to augment the current data in some manner—such as median income of households in the census tract where the stopped person lives, or some other measure specific to the individual?

7. The methodology included a plan for visualizations for geospatial, temporal, and organizational clustering of disparity and the use of time series. What is the intent if matching occurs across some these factors? For example, what is the role of time series if the date/time of event are used in matching?

Once again, the CPC appreciates the opportunity to comment on and ask questions regarding this audit methodology and would appreciate your responses to these questions as soon as possible.

Sincerely,
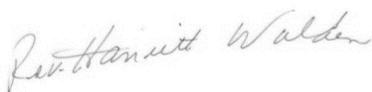
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Cc:

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