



2024 | Annual Report



Seattle Office of
Inspector General

2024 Annual Report

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Office of Inspector General

City of Seattle

PO Box 94764

Seattle, WA 98124-7064

www.seattle.gov/oig/reports

oig@seattle.gov

206.684.3663

The Office of Inspector General for Public Safety (OIG) is charged with systemic oversight of the Seattle Police Department (SPD) and Office of Police Accountability (OPA). In 2024, work in pursuit of our mission included ongoing review, assessments, and audits of SPD policies and practices, as well as certification of OPA investigations into alleged officer misconduct.

Annual Report Requirements

Each year OIG is required to produce an Annual Report describing our work. This includes audit and policy work with SPD and OPA; recommendations developed through OIG projects, and evaluation of the extent to which the accountability entities and SPD are fulfilling their obligations under the Accountability Ordinance. The Annual Report also includes review of trends in inquests, claims, and lawsuits alleging SPD misconduct, successful and emerging practices in other jurisdictions, and OIG review of the OPA complaint-handling system (See Appendix A for the full requirements).¹

Annual Report requirements are addressed in the following chapters:

- **Strategic Leadership:** Strategic work performed by the Inspector General (IG) to advance the department mission, represent the expertise of OIG in stakeholder activities, and prepare OIG to sustain critical reforms after the Consent Decree is lifted.
- **Audits:** Audits and assessments performed in accordance with Generally Accepted Government Auditing Standards (GAGAS) and reviews guided by GAGAS principles.
- **Policy and Compliance:** Policy and research for innovation and improvement informed by best practices and advancements from other jurisdictions, including major special projects that advance the Inspector General's vision for accountable policing. In 2023, this work also included transitioning consent decree compliance responsibilities to OIG from the Federal Monitor.
- **OPA Review:** Review and certification of OPA complaint handling and the OIG complaint intake system.

¹ In 2023, OIG was organized into four functional work areas with staff conducting audits, policy, standards and compliance, and investigations and OPA investigation QA (see Appendix B for OIG organizational chart). As a small department, office staff are frequently cross-trained and able to assist on cross-disciplinary projects where needed.

HIGHLIGHTS

Strategic leadership efforts at OIG ensures projects and priorities foster effective systemic oversight of SPD and OPA in an effort to strengthen public trust. In 2024, OIG monitored SPD use of force and actively collaborated with the City, Court Monitor, and other stakeholders to chart a sustainable path toward accountable policing.

Leadership and Collaboration

OIG leadership engaged in strategic planning and conversation with stakeholders regarding the future of policing, SPD operations during and after the Consent Decree, and monitoring SPD administrative investigations of significant uses of force. Examples of collaborative efforts included:

- Quarterly meetings with the Community Police Commission (CPC), OPA, and SPD leadership, providing strategic coordination and monitoring of accountability recommendations from all oversight entities;
- Reporting to the City Council at public committee meetings, responding to their requests, and monitoring the implementing of local ordinances related to the use by SPD;
- Participation in the City of Seattle state legislative agenda efforts;
- Regular meetings with SPD management and leadership;
- Community meetings and forums, and individual relationship building with community members; and
- Regular meetings with stakeholders.

Use of Force Oversight

The Accountability Ordinance specifically charges OIG with evaluating SPD handling of serious uses of force. OIG reviews force by various means including on-scene IG presence at officer-involved shooting investigation scenes, OIG staff presence during SPD internal use of force reviews, OIG audits, OIG review and certification of OPA investigations of allegations of officer misconduct, and IG technical assistance to SPD and other accountability partners on force-related matters.

The IG and/or her designee responds to investigation scenes of significant uses of force, such as officer-involved shootings, to provide independent observation of the investigation and to ensure the scene is managed according to policy and accepted investigative protocols. Having civilian observers adds a layer of transparency to SPD operations to promote public trust, and provides an opportunity for real-time civilian feedback with the ability to ask clarifying questions on issues of potential importance to the community.

OIG leadership attended Force Review Board (FRB) meetings and provided feedback regarding FRB functions. FRB provides critique of and insight into SPD uses of force.

HIGHLIGHTS

OIG released two audit reports in 2024 addressing SPD's administration of paid COVID-19 leave and how the Department reached disciplinary determinations for officers. OIG also completed a number of surveillance reviews, producing ten reports on individual technologies and one consolidated review. Audit work was commenced on new projects examining leave usage prior to retirement and vehicular pursuits. Also in 2024, OIG was awarded an 'exemplary' award from the Association for Local Government Auditors (ALGA) for the 2023 audit of SPD Compliance with Youth Access to Legal Counsel Requirements.

Audit Standards and Practices

OIG follows the Generally Accepted Government Auditing Standards (GAGAS) set by the United States Government Accountability Office, when conducting audits. These standards contain requirements for how OIG auditors perform their work, including independence, objectivity, standards of evidence, and reporting. Organizations conducting audits in compliance with GAGAS are also required to undergo an external peer review to provide assurance of compliance every three years. Reviews, memos, or other non-audit products issued by OIG follow similar evidence and quality control standards, but for various reasons do not fully meet GAGAS.

Completed Projects

Audit of SPD Paid COVID-19 Leave

This audit found that from late 2020 through the end of 2022, SPD developed an effective system for monitoring the health and work status of employees. This system was likely sufficient to prevent widespread misuse of paid COVID-19 leave. However, OIG found that in providing employees with paid leave for COVID-19 exposure or illness, SPD did not engage in required processes for making substantive changes to wages and working conditions of union-represented employees.

Follow-up Audit of Disciplinary Determinations for SPD Sworn Personnel

Consistent with OIG's 2021 audit, this audit found that officers are often disciplined at the minimum of recommended ranges, and sometimes below. As was the case in the prior audit, this appeared related to the Chief identifying mitigating factors at more than twice the frequency of aggravating factors. The audit also found that OPA often gave SPD insufficient time to review and prepare cases for the Disciplinary Committee.

About ► Audits

OIG conducts performance audits and reviews of SPD to determine the health of department systems and processes. Topics are selected based on an assessment of risk that considers the impact of a potential issue and likelihood of a system problem. OIG uses a variety of methods, including interviews, data analysis, and best practices research to assess whether SPD is delivering "constitutional, professional, and effective police services consistent with best practices...in a way that reflects the values of Seattle's diverse communities."

Annual Surveillance Reviews

OIG issued its second set of Annual Surveillance Usage Reviews as required by SMC 14.18.060. These reviews covered 16 SPD technologies,² including how data is shared and protected, and any potential for violation of civil liberties or disproportionate impacts resulting from use of the technology. Technologies reviewed include:

- Forward Looking Infrared Real-Time Video (FLIR)
- Situational Awareness Cameras Without Recording
- Automated License Plate Readers (ALPR)
- Parking Enforcement (Including ALPR)
- Audio Recording Systems (Wires)
- Camera Systems
- Video Recording Systems (Cameras in SPD facilities)
- Computer Cellphone Mobile Device Extraction Tools
- Remotely Operated Vehicles (ROVs)
- Tracking Devices
- 911 Logging Recorder*
- Coplogic*
- i2 iBase*
- Crash Data Retrieval Tools*
- GeoTime*

Biannual Review of SPD Compliance with Chapter 14.12 of Seattle Municipal Code

Chapter 14.12 regulates SPD's collection of "restricted" and private sexual information. SPD must comply with ordinance requirements, including seeking authorization and regular purging. For the period of review, OIG found that SPD did not notify OIG of three authorizations prior to purging, so OIG was unable to assess them for compliance.

Projects in Progress

Significant work was performed on these projects in 2024.

Audit of Extended Leave Prior to Retirement

This audit examines controls for and impacts of extended periods of sick leave taken by officers prior to retirement. This project was nearing the end of fieldwork in 2024, but was delayed by staffing constraints at SPD and implementation of a new payroll system. OIG expects to issue this audit in the first half of 2025.

Audit of Vehicular Pursuits

This audit examines outcomes of all vehicular pursuits occurring from 2021 through mid-2024, including assessing the effectiveness of current SPD policy and training. OIG anticipates this report will be published in the first half of 2025.

² In September 2024, the City of Seattle re-classified several technologies as no longer considered surveillance technologies under SMC 14.18. These technologies are marked with asterisks in the list above. OIG accordingly completed final reviews for these technologies in 2024, and administratively closed all open recommendations.

Deferred or Canceled Projects

These projects were included in the 2024 workplan but were deferred or canceled, as explained below.

Audit of Impact of Overtime on Officer Performance

In the 2024 Workplan, OIG planned to conduct an audit assessing the impact of significant overtime on officer performance. However, implementation of a new City-wide payroll system has made SPD's provision of timely and reliable records challenging. OIG is delaying this project until the new payroll system is fully implemented and SPD HR has capacity to support this audit.

Audit Recommendation Status

OIG performs annual recommendation follow-up to assess implementation or to close outdated recommendations to SPD, OPA, or other Public Safety entities. In 2024, OIG closed ten recommendations as fully implemented. Another ten recommendations related reports on technologies no longer considered 'surveillance' were closed administratively. A comprehensive snapshot of recommendation status is in Appendix C of this report.

Recommendation Highlight: Disciplinary Action Report (DAR) Reconciliation

In 2021, OIG recommended that SPD "audit and rectify disciplinary documentation for all current sworn personnel and sworn personnel who have been separated since 2018 and provide the results of this process to OIG."

In early 2025, SPD reported completion of a comprehensive audit of all DARs since 2011, identifying and properly filing 379 DARs which had been missing from personnel files. OIG considers this recommendation implemented and recognizes that SPD went above and beyond what was required to address this finding.

HIGHLIGHTS

In 2024, OIG policy work focused on evaluation of SPD policies and practices as compared to nationally recognized emerging practices, assessment SPD and OPA processes, and review of proposed legislation on police accountability and public safety by the state legislature and City Council.

Policy Overview

In 2024, OIG continued to focus on community and data driven policy projects. As in previous years, a central theme guided policy work: the gap between SPD structural legitimacy (what SPD is permitted to do according to law and policy), and its perceived legitimacy (the extent to which the public believes SPD actions are proper and justified).

OIG complemented the efforts of three full-time staff members (a supervisor and two analysts) by engaging academic researchers with relevant subject matter expertise who assisted in the analysis and execution of multiple projects.

Overview of Policy Projects

Review of SPD Mutual Aid

In mid-2019, OIG began an audit of SPD operations when engaging with other agencies under task force and mutual aid agreements to assess compliance with SPD policy. Given the events of 2020 and work in the wake of protests, that audit was held. With the lapse of several years, OIG transitioned the GAGAS audit to a policy project in 2023 and worked with the Seattle Police Operations Center (SPOC) to identify all active mutual aid agreements between SPD and local law enforcement agencies. SPOC also provided OIG with a log of requests for SPD mutual aid since 2014. OIG published the report on SPD mutual aid in July 2024. The report included a review of emerging practices for mutual aid policies, SPD obligations under state law and department policy, and current mutual aid agreements. The review resulted in three recommendations to SPD regarding records management and agreement terms.

Staffing Study of Sworn vs. Civilian Investigations of Police Misconduct

The 2017 Accountability Ordinance enabled OPA to hire civilian investigators and required OIG to conduct periodic assessments of the effectiveness of civilianization. Through collective bargaining, it was determined OPA would “civilianize” two supervisory positions and two investigators. In response to Resolution 31753, Section 4.6, OIG began an evaluation of the impact of OPA hiring civilian employees within its investigation staff.

In 2024, OIG published its second annual assessment comparing civilian and sworn hires to determine if any measurable difference exists between their investigations. As in 2023, the report determined limited data availability and differing duties of sworn and civilian investigators as governed by collective bargaining agreements, continued to limit OIG’s ability to analyze the impact of civilianization.³

About ► Policy

OIG produces policy reports and conducts research and special projects with the goal of fostering innovation and providing insight into issues affecting the Seattle police accountability system, while being responsive to the intersection of constitutional policing and social justice. To that end, OIG conducts data and policy analysis, collaborates with a range of stakeholders, and engages directly with community members.

³ Prior to 2021 there was an absence of data for the assessment. OIG has continued to track aspects of the issue and established baseline metrics to conduct future assessments.

"Excited Delirium" Memorandum

In 2024, OIG reviewed the history and current debate surrounding the use of “excited delirium” and similar terminology in a law enforcement context. This topic is of interest to OIG due to the inclusion of “excited delirium” in training for SPD officers and 911 dispatchers, and in SPD policy as “acute behavior disorder.” The memo offers recommendations for SPD, in partnership with other City agencies, to most safely address medical emergencies using evidence-based techniques. OIG expects to publish this memorandum in the first half of 2025.

Emerging and Standard Practices Research

OIG conducts research regarding emerging and standard practices for policing and public safety. Using sample policies and guidance from the International Association of Chiefs of Police (IACP) and surveys of policies in other jurisdictions, OIG assesses SPD policy to identify potential gaps and improvements. In 2024, policy research included: blast ball usage for crowd control incidents, police interactions with gender-diverse persons, vehicle tactics and pursuits of non-automobile vehicles, and public safety during major events in preparation for the 2026 FIFA World Cup.

State Legislative Agenda

Each year, OIG issues recommendations on the City’s State Legislative Agenda (SLA) and on proposed state-level legislation related to police accountability and public safety. Priorities are determined by assessing themes of OIG work to identify areas where legislative efforts might improve systems of policing. OIG policy recommendations consider laws, practices, and stakeholder input. OIG also reviews emerging legislation on police and police accountability nationwide to stay informed on evolving national trends and practices.

In 2024, OIG consulted with a wide range of stakeholders to review legislation, including community-based organizations and public agencies such as the American Civil Liberties Union (ACLU) of Washington, the Office of Intergovernmental Relations (OIR), The Office of the Mayor, OPA, and CPC.

SPD Claims

Persons alleging fault by SPD for incidents resulting in loss, injury, or damages can file claims with the City. Claims are reviewed and investigated by the Seattle Risk Management Office and can result in the City:

1. Paying a sum of money;
2. Transferring the claim to another entity; or
3. Denying the claim, finding no evidence of city negligence.

Ordinance 125315, 3.29270 ¶14 charges OIG with the “assessment of inquests, federal and local litigation, and their final outcomes, patterns relating to civil and lawsuits alleging SPD misconduct, payout amounts over time, units disproportionately represented as subjects of claims and lawsuits, related training, and review of the investigations of the underlying incidents in such claims and lawsuits.”

To comply with this mandate, OIG conducts an ongoing assessment of complaint types, resolutions, and payments made by the City for claims and lawsuits filed by SPD personnel and by community members in response to police actions.

OIG reviewed claims and lawsuits against SPD for 2024. In 2024, Seattle Finance and Administrative Services tracked 145 claims filed. As of the time of writing, 33 claims remain open and 112 have been closed; 39 of the claims made in 2024 have reached settlements with the City. Table 4.2 shows the breakdown of claims made against SPD and payments made by the city from 2021–2024.

Table 4.2: SPD Claims and Payouts 2021-2024*

| | Claims Filed | Claims Settled | Payment |
|------|--------------|----------------|--------------|
| 2021 | 235 | 110 | \$128,991 |
| 2022 | 138 | 35 | \$362,608 |
| 2023 | 206 | 121 | \$2,063,850 |
| 2024 | 145 | 39 | \$158,437.70 |

*This table reflects the data available to OIG at the time of publication.

SPD Claims Related to 2020 Protests

OIG tracks claims related to the 2020 protests. No protest-related claims were filed or settled in 2024. OIG will continue to track 2020 protest claims as remaining claims are processed.

SPD Lawsuits

Lawsuits brought as a result of SPD operations generally involve labor disputes, torts, or police action. In these cases, SPD is counseled and represented by the City Attorney's Office (CAO) Civil Division. There are four possible resolutions for litigation: dismissed/no payment, settlement, judgment with payment, and judgment without payment.

Torts

Torts involve allegations of personal injury and property damage related to SPD. These include allegations of police negligence unrelated to use of force, such as injury caused by an SPD employee traffic accident. In 2024, eight tort claims were filed against the City and seven were closed. Five tort claims were filed in previous years and remained open in 2024.

Police Action Lawsuits

Police actions result from allegations that SPD operations, personnel actions, equipment, or vehicles were responsible for loss, injury, or damage. Five police action cases were filed against the city in 2024; 18 police action lawsuits were filed in previous years and active in 2023. Six lawsuits filed in previous years were resolved in 2024.

Collaboration

The Policy Unit supported other OIG teams in their 2024 work. This support included data analysis, research, and assistance with investigations.

HIGHLIGHTS

In 2024, OIG monitored SPD ongoing fidelity to Consent Decree requirements through assessment of SPD uses of force, supervision, and response to individuals in crisis.

Standards & Compliance Overview

Standards and Compliance continued to develop assessment frameworks to provide ongoing oversight of Consent Decree provisions. OIG completed robust assessments of SPD use of force and response to individuals in crisis, providing updates on SPD compliance with Consent Decree requirements and exploring new methods to create feedback loops and provide ongoing assessment.

Overview of Policy Projects

SPD Use of Force

In February 2024, OIG completed the court-ordered Use of Force (UoF) Assessment which evaluated SPD uses of force between 2021 and 2023 using both quantitative and qualitative methods. The assessment included a descriptive “map” of the force investigation and review process, and an update on SPD policies related to mass demonstrations and crowd management.

OIG reviewed SPD data on force incidents, subjects of force, officer and subject injuries, force used during crisis events, and OPA data related to force misconduct allegations. During the review period, use of force rates remained at historical lows. OIG identified an increase in the use of “unknown” or “unspecified” race designations for individuals who experienced force.

The UoF Assessment summarized OIG collaboration with SPD to improve approaches to crowd management and responses to mass demonstrations. OIG continued to monitor SPD implementation of Sentinel Event Review (SER) recommendations regarding communication, tactics, and community legitimacy in large crowd events.

OIG also assessed SPD internal review of force by evaluating the Force Review Board (FRB), including attendance at all FRB meetings; regular meetings with SPD leadership; and interviews with board members, Force Review Unit (FRU) leadership, and other SPD stakeholders. OIG provided a series of suggestions developed from observation and conversations with stakeholders.

After the UoF Assessment, OIG committed to provide updates through memorandums addressing implemented changes and summaries of additional feedback provided to SPD. SPD implemented many of the suggestions made by OIG in the UoF Assessment. These were summarized in the FRB memorandum published in September 2024.

About ► Standards & Compliance

OIG produces policy reports and conducts research and special projects with the goal of fostering innovation and providing insight into issues affecting the Seattle police accountability system, while being responsive to the intersection of constitutional policing and social justice. To that end, OIG conducts data and policy analysis, collaborates with a range of stakeholders, and engages directly with community members.

SPD Response to Individuals in Crisis

OIG completed the “SPD Crisis Assessment” in October 2024. The report was submitted to the Federal Court to provide an update on SPD’s response to individuals in crisis, particularly on force used in crisis contacts.

Analysis of SPD crisis intervention data between 2021 and 2023 indicated similar outcomes as those previously reported by the Monitoring Team, with improved data collection related to individual demographics. Consistent with previous Monitoring Team reports, OIG found SPD to be in continued compliance with the crisis intervention requirements of the Consent Decree.

To evaluate crisis intervention trainings provided to SPD officers, OIG attended the optional weeklong crisis certification course administered by the Washington State Criminal Justice Training Commission, a four-hour annual SPD training provided to all SPD officers, and a 911 dispatcher crisis identification training. In preparation for the assessment, OIG reviewed emerging and standard practices in crisis response and adult learning. OIG found many of the trainings prioritized de-escalation and reducing the need for force. The dispatcher training aligned with SPD policies and training. OIG also identified potential improvements for trainings to more closely align with national emerging and standard practices.

The qualitative assessment of SPD crisis response reviewed a sample of cases from 2023. The assessment reviewed relevant video and documentation from officers and their COC on various dimensions including crisis planning and tactics, respectful interactions with subjects, and thoroughness of review. OIG observed officers largely acted within policy, with the COC or FRU identifying and addressing any practices found to be out of policy. This qualitative review laid the groundwork for larger follow-up assessments and demonstrated OIG capacity to conduct in-depth qualitative research.

Equity Assessment

In 2024, OIG completed preparations for an assessment of race and gender equity within SPD, including a robust literature review on the historical, cultural, and organizational barriers to equity within police departments. In collaboration with SPD, OIG identified current efforts to foster equity and inclusion, as well as barriers to their implementation, both within and outside the department. In consultation with academic subject matter experts, OIG is reviewing current SPD initiatives to identify milestones achieved and suggestions to support further implementation.

HIGHLIGHTS

OIG is committed to continuing its work with OPA to achieve fair and consistent outcomes, focusing on issues that foster and maintain public trust. OIG found that OPA conducted thorough, objective, and timely investigations in 2024, achieving full certification in just over 95% of cases.

Classification Review

Consistent and proper classification of complaints is a matter of public trust. Upon receiving a complaint, OPA conducts a preliminary review (an “intake”) to determine whether a full investigation or other resolution is appropriate to address the allegations. To ensure complaints are assessed in a fair manner and in accordance with OPA and SPD policies, OIG reviews OPA classification decisions to determine if the classification was appropriate; and whether OPA properly identified all allegations and associated employees.

Complaints routed for investigation are reviewed at the conclusion of the investigation and do not undergo classification review by OIG. In 2024, OIG evaluated 1,042 OPA classification decisions and certified 277 individual OPA investigations.

There are four primary classification types:

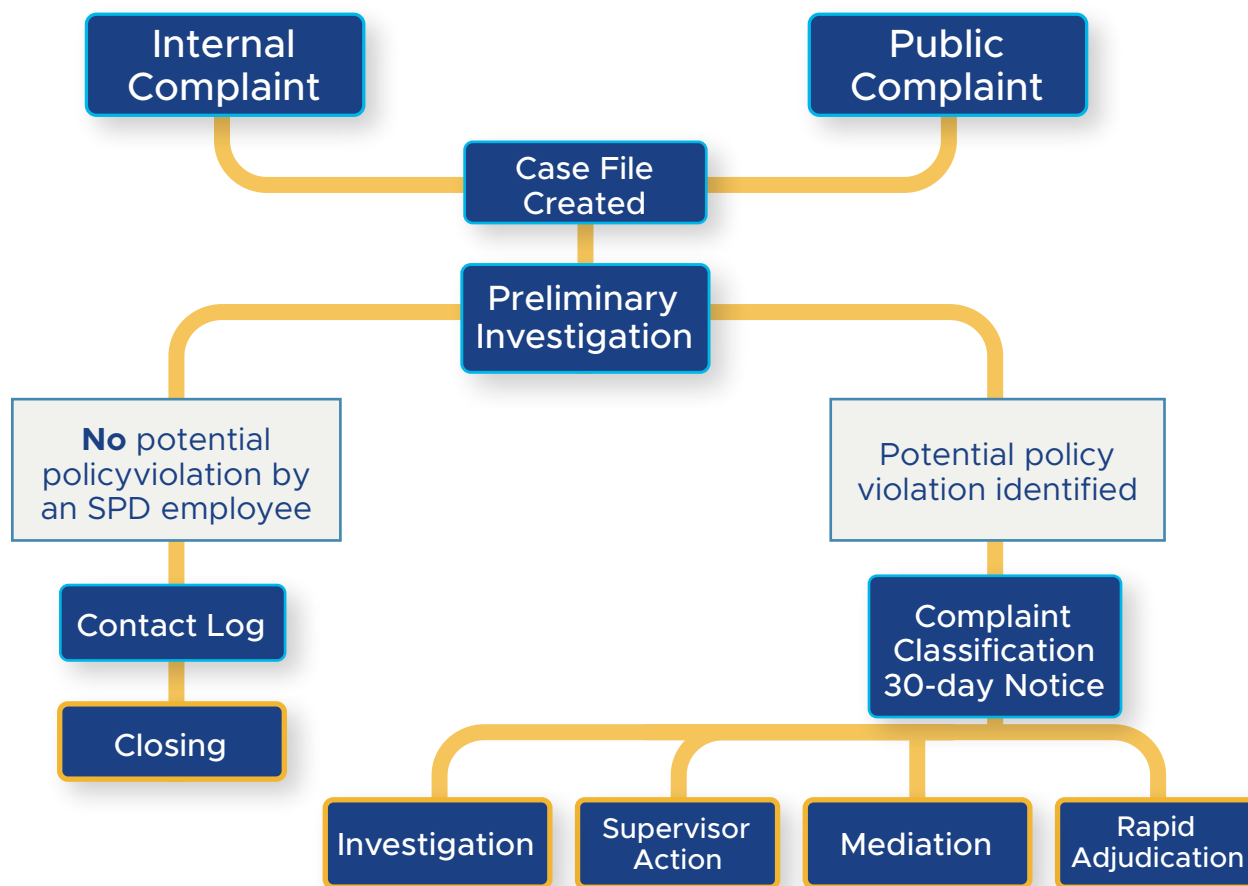
1. **Contact Log:** Used when a complaint does not involve an allegation of potential misconduct against an SPD employee, or there is insufficient information to proceed. OPA records the intake with a case number and sends the Complainant a closing letter but does not take any other action.
2. **Supervisor Action:** Used when the complaint involves a minor policy violation or performance issue that OPA determines is best addressed by the employee’s Chain of Command. Supervisor Actions can include training, communication, or coaching. They can also be used to address allegations that are not a violation of policy but impact community experience or effectiveness. OPA may also issue an “FYI” Supervisor Action for a complaint deemed unfounded through the intake investigation that does not meet the criteria to be closed as a Contact Log.
3. **Expedited Investigation:** Used when the Complainant alleges a serious policy violation where preliminary evidence disproves the allegation or proves minor misconduct may have occurred, but OPA has determined the allegations are best handled through a training referral or management action rather than discipline. Expedited cases are reviewed by OIG simultaneously for both proper classification and certification of the investigation. If OIG disagrees with the classification, OPA reclassifies the case for further investigation.
4. **Investigation:** Used in cases of alleged serious misconduct, that, if true, would be a violation of SPD policy or law. Following an investigation, including interviews of witnesses and named employees, OPA issues a recommended finding that could result in formal discipline by the Chief of Police.

About ► OPA Review

OIG oversight of OPA ensures accountability at two critical junctures in the handling of misconduct allegations against SPD employees. First, OIG reviews the classification decision made by OPA to ensure a complaint is routed appropriately. Second, when an investigation is complete, OIG reviews the investigation, provides feedback, requests additional investigation when necessary, and certifies whether the investigation was thorough, timely, and objective. If a conflict of interest prevents OPA from handling a complaint made against one of its employees, OIG investigates the complaint. After assuming responsibility for investigation of a complaint, OIG follows the OPA process to maintain consistency in the system, with the same authority as OPA.

OPA uses other case disposition programs including **Rapid Adjudication and Mediation** which are discussed further below.

Figure 5.1. OPA Case Intake Process



Classification Review Methodology

OPA began operating under a new manual in 2022. OPA previously used a 2016 court-approved manual which only identified two classification types: Supervisor Action and Investigation. Since 2016, OPA has created a new classification type, Expedited Investigation, and redefined the Contact Log classification from an administrative function into a classification type. When assessing classifications in 2024 for appropriate designation, OIG relied on the criteria outlined in the 2022 OPA Manual, the Accountability Ordinance, and on the definitions created by OPA for new classifications.

In 2024, OIG reviewed classification determinations on a rolling basis throughout the year, with the exception of batch contact logs. In previous years, OIG reviewed a sample of OPA's classifications on a quarterly basis. Beginning in 2023, OIG employed a new methodology of reviewing cases weekly, which provides the opportunity for more timely feedback in situations where OIG does not concur with a classification decision. Non-concurrence often leads to cases being reclassified. In 2024, OIG used the following review methodologies:

- **Expedited Investigation:** OPA proposes a case for expedited investigation, which is reviewed individually at the time of classification. If OIG did not concur with the proposal,

OPA reclassified the case for further investigation.

- **Supervisor Action:** Reviewed individually on a weekly basis as OPA determines the classification. In instances where a case is classified as an investigation, OIG reviews the Supervisor Action at the time the Supervisor Action is added to the casefile.
- **Contact Log:** Reviewed individually on a weekly basis after OPA determines classification.
- **Rapid Adjudication:** Reviewed prior to official classification to ensure OIG agrees the complaint is appropriate to handle through Rapid Adjudication.
- **Mediation:** Reviewed prior to official classification.

OIG review of cases occurs at different intervals after a complaint is filed with OPA based on the classification type. For example, a contact log may be ready for OIG review in only a few days, while an Expedited Investigation is typically sent to OIG approximately 30 days after a complaint is filed with OPA. This can result in differing numbers of cases reviewed by OIG in 2024 from the number of cases OPA reports received or closed in a calendar year.

Classification Review Findings

In mid-2022, OIG began reviewing all classification decisions on a weekly basis. This practice continued through 2024, except in the case of Batch Logs. Table 5.1 below provides review data by classification type.⁴

Table 5.1. OIG and OPA Classification Concurrence by Case Type

| OPA Classification | Review by OIG | Level of Concurrence |
|-------------------------|---------------|----------------------|
| Contact Log | 73 | 100% |
| Batch Contact Logs | 716 | 100% |
| Supervisor Action | 162 | 98.77% |
| Expedited Investigation | 126 | 97.6% |
| Bias Reviews | 89 | 100% |
| Rapid Adjudication | 1 | 100% |
| Mediation | 1 | 100% |
| Total | 1,168 | |

Expedited Investigations

In 2024, OIG concurred with approximately 97.6% of cases (123 of 126 total expedited requests) designated for handling as Expedited Investigations (see table 5.1). This is consistent with 2023, when OIG concurred with 98.6% of cases proposed as Expedited.

⁴ Prior to 2019, OIG conducted individual classification review, resulting in a high level of agreement because OIG provided real-time feedback to OPA prior to decisions. When OIG moved to quarterly sample review of classification decisions in 2019, retrospective assessment produced less concurrence and provided only opportunity for future improvement. In 2022, OIG returned to conducting individual classification review.

In some proposed Expedited classifications, OIG did not initially concur due to insufficient evidence or other deficiencies, resulting in OIG requesting additional information from OPA. In many instances, OPA was able to remedy identified deficiencies prior to classification to gain concurrence and receive certification of the Expedited Investigation. In one case, OIG initially reviewed a case in 2024, but requested additional investigation and ultimately accepted the expedited request in 2025. Because the case was not certified in 2024, the case will be incorporated into data for 2025.

In other proposed Expedited Investigations, OIG did not concur with OPA's classification; the cases were reclassified. Some expedited allegations were accepted on certain allegations but not on others. In these cases, OPA received a certification for allegations accepted as an Expedited Investigation, with the case then bifurcated and the remaining allegations fully investigated. In 2024, OIG issued multiple certifications on 10 individual cases, a decrease from 18 in 2023.

Contact Logs

A Contact Log classification can be handled in two ways. Complaints with sufficient information to evaluate and undergo a full intake process are assigned a case number (73 in 2024). Complaints that do not meet the low threshold to allow for evaluation are not assigned a case number and are stored in a Batch Log (1,720 cases in 2024).

The Batch Log is for general contacts with OPA where no policy violations are alleged. These contacts are compiled under a single IAPRO case file. In early 2024, OIG faced limited staffing that no longer allowed for weekly reviews of contact logs stored in the Batch Log. The files stored in the Batch Log were reviewed on a weekly basis through Q1 2024; OIG then began reviewing a statistically significant sample at the end of each quarter for the remainder of the year. OIG did not identify any complaints in the Batch Contact Logs alleging serious misconduct by SPD employees. Complaints included in the log were often regarding another jurisdiction or department, media requests, questions about public records, or issues otherwise unrelated to policy violations. OIG will return to reviewing the Batch Log on a weekly basis in Q2 of 2025.

OPA appears to use the Contact Log classification appropriately, as OIG had 100% concurrence with these case classifications in 2024.

Supervisor Actions

In 2024, OIG's rate of concurrence for Supervisor Actions was 98.77%. OIG reviewed Supervisor Action classifications on a weekly basis in 2024, allowing for a timely review shortly after classification. OIG reviewed Supervisor Actions that were part of higher levels of classification (such as Investigations and Expedited Investigations) to ensure Supervisor Actions were reviewed in a timely manner, and not at the conclusion of the investigation. The 162 total Supervisor Actions reviewed in 2024 reflects the number of cases involving at least one Supervisor Action. In some cases, multiple Supervisor Actions might be issued under the same case number, such as when multiple employees fail to complete training by a required date, so the actual number of Supervisor Actions issued is higher than the number of cases with Supervisor Actions OIG reviewed.

Investigation Review

OIG certifies whether OPA investigations are timely, thorough, and objective using criteria delineated in the Accountability Ordinance, including whether:

- Witnesses were contacted, interviewed, and all other material evidence was collected in a timely manner.
- Interviews were thorough and unbiased, conflicting testimony was sufficiently addressed,

- and OPA investigators did not shy away from asking challenging and necessary questions.
- Additional clarifying information would strengthen the investigation.
 - The written summary and analysis are objective and accurately reflect the evidence.
 - Applicable OPA procedures were followed, and the intake and investigation were conducted in accordance with the OPA Manual.

Investigation Review Methodology

OIG considers each investigation on a case-by-case basis to assess whether OPA has sufficiently addressed the allegations brought forward in accordance with the Accountability Ordinance, the relevant collective bargaining agreement(s), and the OPA Manual requirements to achieve procedural justice.

When examining the **timeliness** of OPA investigations, OIG examines whether:

- Completion of the investigation is within 180 days, minus any period in which an extension was granted or time was tolled, otherwise discipline cannot be imposed.
- Complaints are classified within 30 calendar days after receipt.
- Named employees are notified of complaints against them by the time classification occurs.
- Named employees are notified in advance of interviews in accordance with labor contract requirements; and investigations are submitted to OIG in a timely manner to afford sufficient time for feedback and additional OPA investigation if requested or directed by OIG.

When assessing the **thoroughness** of OPA investigations, OIG examines whether:

- All allegations are identified, and each allegation is sufficiently addressed.
- Investigation steps are clearly documented.
- Relevant evidence is collected and accurately reflected in the OPA report.
- Interviews are comprehensive.
- Complainants are offered the chance to be interviewed regarding their allegations.
- Perishable evidence has been preserved where possible.

When assessing the **objectivity** of OPA investigations, OIG examines whether:

- The investigation includes all relevant evidence.
- Facts and analysis are conveyed in a manner that does not express or indicate bias.
- Conflicting testimony has been addressed.
- Interviews do not use leading or suggestive questions.
- The intake and investigative process complied with policies in the OPA Manual.

During the review process, OIG feedback to OPA may include formal requests (e.g., a memo directing additional investigation) and informal requests or inquiries via email or Teams meetings. If OIG identifies a deficiency that would impact the certification or case outcome, OIG will formally direct additional investigation or require modifications to the investigative record. In such cases, after being provided with the opportunity to resolve any identified deficiencies, OPA resubmits the case to OIG for review and a certification decision. Informally, OIG may offer suggestions regarding further investigative steps, request minor fixes to the investigative record, or provide feedback for future cases.

Investigation Review Findings

In 2024, OIG issued 288 certifications for 277 cases, with 10 bifurcated cases receiving multiple certifications. As depicted in Table 5.2, approximately 43.1% (124 out of 288) of all certifications in 2024 were for allegations handled as Expedited Investigations. The remaining 56.9% were processed as Investigations. Table 5.2 represents all certifications issued by OIG in 2024, as the 10 bifurcated cases received more than one certification. Overall, just over 95% of certifications issued by OIG found OPA investigations to be objective, thorough, and timely.

Table 5.2. Certification Review Outcomes by Investigation Type⁵

| Case Type | OIG Certifications | Full Certification | Partial Certification | Null Certification |
|-------------------------|--------------------|--------------------|-----------------------|--------------------|
| Expedited Investigation | 124 | 122 | 2 | 0 |
| Investigation | 164 | 152 | 12 | 0 |
| Total | 288 | 274 (95.1%) | 14 (4.9%) | 0 (0%) |

Partial Certifications

OIG issued fourteen partial certifications in 2024. The main certification deficiency was timeliness of investigations, with ten cases designated as untimely (3.5% overall). While this was the biggest area of deficiency, it is an improvement from the 4% in 2023 and can be credited in part to a change in collective bargaining language which removed the need for OPA to send five-day notices. Three investigations were found to not be thorough, and one was found to not be objective. The number of partial certifications issued in 2024 was 14 of 286 certifications issued (4.9%) and is an improvement from 27 of 344 certifications issued in 2023 (7.8%).

Table 5.3. Certification Issues by Category

| OIG Certifications | Total Count | % of Total Cases |
|---|-------------|------------------|
| Partial: Not Objective | 1 | 0.3% |
| Partial: Not Thorough | 3 | 1.0% |
| Partial: Not Timely | 10 | 3.5% |
| Subtotal | 14 | 4.9% |
| Full: Timely, Thorough & Objective | 274 | 95.1% |
| Total Certifications Issued by OIG | 288 | 100% |

Note: Percentages are rounded to the nearest tenth of a percent.

⁵ Table 5.2 provides a breakdown of certifications issued by OIG, rather than total number of cases reviewed. Eighteen cases were bifurcated and receive more than one certification.

Alternative Programs

Rapid Adjudication

In 2019, OPA began the Rapid Adjudication program. The program is described in the Seattle Police Officers Guild (SPOG), Seattle Police Management Association (SPMA) Collective Bargaining Agreements (CBA), and on OPA's website. Rapid Adjudication is an option for employees who acknowledge their conduct was inconsistent with policy and accept discipline without undergoing an investigation by OPA. Rapid Adjudication can be initiated by a named employee or by OPA.

In 2024, one case was sent to OIG requesting review for Rapid Adjudication. Although OIG concurred with this classification, the case was not ultimately processed as a Rapid Adjudication. In this case, OIG agreed with the classification, but SPD declined the use of Rapid Adjudication because OPA took more than the ten days allotted by the SPOG CBA to determine if the case was appropriate for Rapid Adjudication and it was determined the facts of the case did not fit the proposed discipline. The case was instead handled as an investigation. OIG fully certified this case, and the certification is counted in Tables 5.2 and 5.3.

Mediation

OPA may offer Mediation to Complainants and Named Employees to resolve disagreements (especially those involving possible miscommunication or misperception) with the guidance of a neutral third party. When accepted by both parties, mediation provides final resolution of the case.

In 2024, one case was successfully resolved by OPA through this alternative resolution program. OIG will continue to review this program and its implementation going forward. While Mediation is not appropriate for some allegation types, OIG encourages OPA to continue developing and utilizing this program. Mediation offers Complainants and SPD employees the opportunity to share their perspectives as an opportunity to foster public trust.

Bias Reviews

Bias-free policing and appropriate attention to bias allegations are integral to police accountability and public trust. While Bias Reviews are not an official OPA classification, they are one of two processes by which biased-based policing allegations against SPD personnel can be addressed: Complainants may make complaints to SPD employees on-scene or file a complaint directly with OPA.

Bias Reviews are an internal process specified in SPD policy. When a community member alleges bias-based policing, a supervisor must be called to the scene to conduct a preliminary investigation. The reviewing supervisor discusses the allegation with the individual and explains the option to file a complaint with OPA. If the community member does not ask that the matter be referred to OPA, and if the supervisor determines through a preliminary investigation that no misconduct occurred, the supervisor will resolve the matter by filling out a Bias Review Template. If the individual does not cooperate with the Supervisor or has left the scene, the Supervisor is required by policy to review Body Worn Video to assess the incident and complete the template. The completed templates are reviewed by the Chain of Command and OPA prior to being closed.

In 2024, OIG reviewed each Bias Review that was submitted from SPD to OPA. OIG's reviews were conducted on a weekly basis. OIG found no issues with SPD handling of Bias Reviews.

OIG Investigations and Complaint Intake

OIG Investigations

OIG opened six cases in 2024. Of those cases, two were classified for investigation and the remaining four were classified as Contact Logs. As OIG investigations are completed, closed case summaries are posted to the OIG website.

Chief of Police Complaints

In 2022, the City Council passed City of Seattle Ordinance 126628, which provides OPA and OIG authority to investigate complaints against the Chief of Police and guidance on doing so. OIG is required to provide oversight of the intake process for such complaints, ensuring they are handled timely and assigned for investigation appropriately. When handled by an outside investigator, OIG manages the process and makes required notifications to involved employees and stakeholders.

OIG is required to report on the number of complaints against the chief resolved through a Contact Log classification. In 2024, 27 complaints against the chief were closed as Contact Logs. Five of the complaints closed as contact logs in 2024 were duplicate complaints, meaning they were closed because an investigation already existed under a different case number.

In 2024, OIG dedicated significant resources to investigations involving the former Chief of Police. Specifically, OIG managed the contracts for outside investigators on numerous cases. Additionally, OIG was responsible for coordinating access to SPD records, ensuring compliance with relevant labor agreements and City personnel rules, and scheduling interviews with SPD staff members. External investigation costs were limited by OIG's assistance in some cases, however, these investigations did represent a significant cost that was not initially reflected in the budget.

Complaint Hotline

The Accountability Ordinance requires OIG to maintain a hotline for community inquiries and complaints against SPD.⁶ OIG received around 850 calls and email complaints in 2024. These complaints are triaged and either responded to by OIG staff or routed to the appropriate department.

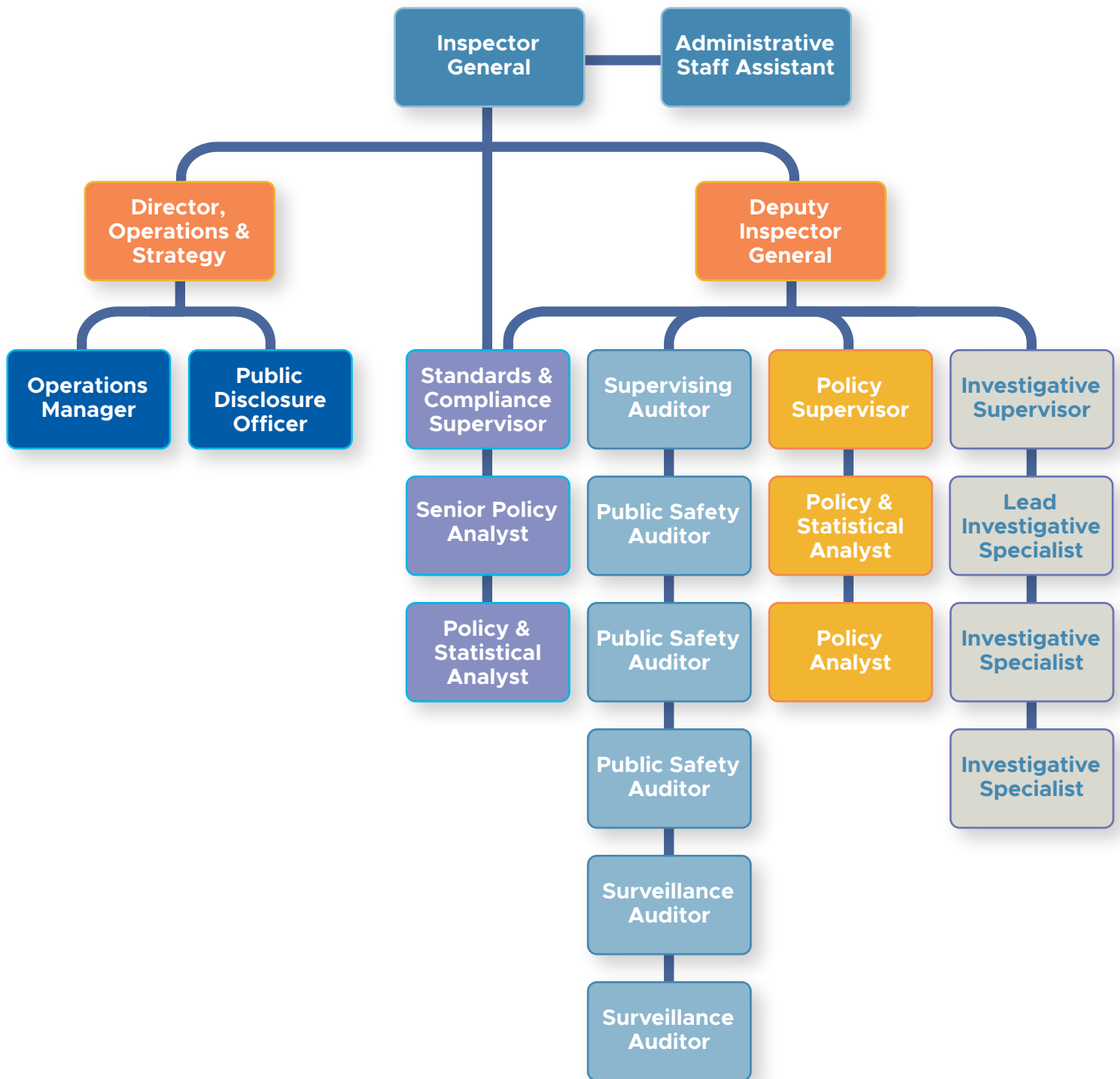
⁶ Ordinance 125315, 3.29.200 ¶18

Ordinance 125315, §3.29.270.D

The Inspector General shall produce annual reports that are readily understandable and useful to policymakers. The annual report shall include, but not be limited to, the following:

1. A summary of OIG's audit and review activities for the previous year;
2. An evaluation of the extent to which the purposes, duties, and responsibilities detailed in this Chapter 3.29 have been met by the responsible entities;
3. A description of the work of OIG in fulfilling OIG's purpose, duties, and responsibilities detailed in this Chapter 3.29;
4. Inspector General recommendations for changes in policies and practices, collective bargaining agreements, City ordinances, and state laws;
5. A summary of the implementation status of any previous OIG recommendations, and for any that have not been implemented, the reasons;
6. A summary of OIG's review and the outcome of SPD reviews for officer-involved shootings, in-custody deaths, and any other cases of significant public concern;
7. An analysis of any patterns and trends of disproportionality or other concerns compared to previous years, including from review of inquests, claims and lawsuits alleging SPD misconduct;
8. The outcome of reviews of successful practices in other jurisdictions, and any associated OIG recommendations, including for changes in the mix of OPA sworn and civilian staff;
9. A summary of information received from OIG's hotline, any of its other anonymous intake systems, and from community outreach that has informed OIG's work; and
10. A summary of OIG's review of OPA's complaint handling system, including at a minimum:
 - a. The number of investigations reviewed;
 - b. A general description of the complaints and cases reviewed by OIG;
 - c. A description of OPA's follow-up for those cases which OIG did not certify and those cases for which OIG requested or required further investigation;
 - d. A review of cases not investigated by OPA, including Contact Logs, Supervisor Action referrals, mediation, Rapid Adjudication, Management Actions and Training Referrals; and
 - e. A description of any concerns or trends noted in OPA complaint intake and investigations.

Seattle Office of Inspector General 2023 Organizational Chart



APPENDIX C

| Report with Recommendations | Year | Fully Implemented | Open/Pending | Closed: Non-Concur | Closed: Admin |
|---|-------------|-------------------|--------------|--------------------|---------------|
| Chapter 14.12 Compliance | Reoccurring | 4 | 4 | 2 | |
| Surveillance Technologies (All Reports) | Reoccurring | 2 | 10 | 1 | 10 |
| Audit of Disciplinary Determinations for SPD Sworn Personnel | 2024 | | 1 | | |
| Audit of SPD Compliance with Youth Access to Legal Counsel Requirements | 2023 | | 8 | | |
| Audit of Disciplinary System for SPD Sworn Personnel | 2021 | 5 | 6 | | |
| Audit of Secure Firearm Storage in Training Facilities | 2021 | 3 | 3 | | |
| Audit of SPD Patrol Canine Teams | 2019 | 11 | 3 | | 1 |
| Total | | 26 | 37 | 3 | 11 |

Recommendation Status Definitions:

- **Open/Pending:** SPD has received or is currently working to implement the recommendation. OIG will follow up on the recommendation in the future.
- **Partially Implemented:** SPD implemented part of the recommendation and provided rationale for why it was not fully implemented. OIG will no longer request updates.
- **Fully Implemented:** OIG has determined that the recommendation or the intent of the recommendation has been met. OIG will no longer request updates.
- **Closed – Administrative:** The recommendation is no longer relevant or feasible.
- **Closed – Non-Concur:** SPD management does not agree with the recommendation and does not intend to implement the recommendation.