Seattle
Community
Police Commission

April 7, 2021

Dr. Antonio M. Oftelie
Court Monitor for *United States v. City of Seattle*
Antonio.oftelie@seattlepolicemonitor.org

Re: CPC Questions and Feedback Regarding the Monitor Plan and Draft Assessment Methodology

Dear Monitor Antonio Oftelie,

On February 17, 2021, the Seattle Police Department (SPD) Monitoring Team introduced its 2021 **Monitoring Plan** to the Community Police Commission (CPC). On March 17, 2021, the Monitor also introduced its **Draft Assessment Methodology**. The CPC committed to providing input by April 8, 2021. This letter serves to provide feedback and ask questions about the draft Monitoring Plan and Methodology.

As an initial matter we wish to thank you for the opportunity to weigh in on the Monitoring Team's plans. However, the CPC wishes to raise concerns about how late in the process the Monitoring Team consulted the CPC. The memo says the Monitoring Team convened with City and Community stakeholders between October and December 2020 for feedback on the preliminary plan. The CPC did not see the plan until the Monitor introduced it in February 2021. Nor did the Monitoring Team seek any input or even attempt to meet with the CPC in any way to discuss this plan. Considering that the CPC is one of the core principles of the accountability system in Seattle, we were deeply surprised by this oversight. We ask for a commitment from the Monitoring Team moving forward to include the CPC early on its strategic planning and implementation of reforms.

Questions about Monitor Plan

1. Under crowd management internal accountability, the plan mentions systemic recommendations from OIG (from the Sentinel Event Review) and OPA (from Management Action Recommendations) but does not mention the crowd management recommendations provided to SPD and the Monitoring Team by the CPC. Why are CPC recommendations regarding crowd management not considered part of internal accountability, along with OPA's and OIG's, for purposes of the Monitoring Plan? Please remedy the oversight and ensure that the CPC's recommendations are included in this section and its attendance obligations.
2. There are several projects that the CPC could be involved in but in which the Monitoring Team has failed to identify CPC as a partner. These include strategic discussions and meetings regarding the

discipline system, risk management (Compstat for Justice, Early Intervention System, Officer Wellness) and Re-Imagining Public Safety, for instance. Why is the CPC not involved in these? Please remedy the oversight and ensure that the CPC has the opportunity to provide its unique insight into these discussions.

3. Under ABLE, the plan says that SPD will certify that eligible officers completed the training and share how many failed to complete it without good cause. Please identify what constitutes good cause that would enable an officer to not have to complete ABLE training.

4. Overall, we are interested in understanding how the proposed methodology was developed. Was it mostly an update of the previous monitoring methodology or was it developed to highlight specific concerns? For instance, reports from the last phase showed troubling disparate racial impacts in use of force and contacts. Has the monitoring of racially disparate impacts advanced in this proposal?

Questions about Draft Methodology

Overarching questions

1. The Draft Methodology consists of *aggregate* data that SPD gathers and then shares with the Monitor. The most important questions are thus answered internally by SPD seemingly without an external check to ensure accuracy. How does the Monitor plan to verify the aggregate data and reports provided by SPD for completeness and accuracy?

2. The Methodology mentions demographic data at several points. What categories for race, ethnicity, gender, and tribal affiliation does the Monitor expect SPD to use? The CPC cares deeply about collecting data that does not misrepresent or erase our communities. We believe these reports are a great venue to improve SPD data collection and would love to collaborate on drafting appropriate categories.

3. Most data will be collected at aggregate levels for comparison across time. Are these metrics compared to target indicators? How will the Monitor determine if a data point or indicator is "good" or "bad"?

Questions about specific sections

4. In Crowd Management (Section II, Methodology Questions), how large is the universe of reports between May 25 and November 30 and how large is the sample? How will the sample be selected? How will the Monitor process and analyze this large body of data? Will it happen in time for the June report?

5. In Crisis Intervention (Section III, Objective 3), why is this audit being provided back to SPD, unlike other sections where SPD authors the report and provides it to the Monitor? Who will author it?

6. In Crisis Intervention (Section III, Objective 4), what are the "new analytics capabilities described"?

7. In Supervision (Section V, Methodology Questions), what are the "new" levels? Why are they compared to 2018 specifically?

Feedback on Draft Methodology

Overarching feedback

- The data collection years are very inconsistent throughout the Methodology. Section I says 2019-2020, but other sections mention 2018, 2021, or different combinations. Please clarify and standardize what periods are covered throughout the Methodology.

- It would be helpful to have each section specify and provide links to the Phase I and II Assessment Reports they will be updating, as well as the period covered by the previous reports.
- It is not clear who will be authoring each report and why. This is specified in some places but not others. It would also be helpful to know why some reports are authored by SPD but not others.

Feedback on research questions and methods

- Some questions are subjective and may lead to poor reporting. How will SPD answer "Are officers appropriately filling out crisis templates?" A more objective and measurable indicator would be, for example, "share of reports with an error."
- Several questions are yes/no, like whether data has been "collected, maintained, and retrieved." Will these data also be provided? We recommend rephrasing. For instance, instead of "Do supervisors review the progress of strategies as appropriate" it could be "What share of supervisors review the progress of strategies as appropriate" (Section V)?
- We assume that the methodology in Section II, Objective 2 is being introduced and is different from previous reporting, but we recommend making this clear.
- Section IV, Stops and Detentions, needs a more advanced methodology to evaluate the effect of the causal training in changing outcomes (random sample, controls, experiment, etc.).
- In Section IV, how will APRS define and determine "adequate"?

Feedback on language and structure for clarity and accessibility

- There are several sections titled "Methodology questions" that do not really list methodology questions. For clarity, we recommend calling them "Data collected" or similar.
- "Report" and "audit" seem to be used interchangeably. Are both referring to Compliance Assessment Reports? Alternatively, will SPD or the Monitor conduct GAGAS/Yellow Book audits? If not, we recommend standardizing language to "reports" to avoid confusion.
- In Crisis Intervention (Section III, Objective 4), the language explaining FRB and FRU is redundant with Section II. Also, why mention that SPD will continue to provide verbal tactics training? Overall, there are sections that may not fit in a methodology document. We suggest removing for clarity.
- Define all acronyms throughout text for clarity and accessibility: SER, CIT, CI, CIC, EIS, PRC (at least).

We kindly ask that you respond to our questions in writing, as well as consider our feedback and report on how you will incorporate it into the final Methodology. Please let us know if you have any questions.

Sincerely,

Community Police Commission