

2025 Annual Review of OPA Sworn and Civilian Staffing

October 29, 2025

Executive Summary

The Accountability Ordinance requires the Office of Inspector General (OIG) to assess the effectiveness of the Office of Police Accountability's (OPA) mix of sworn and civilian staffing and report annually on any changes.

OPA is an independent, civilian-led agency that investigates misconduct allegations against Seattle Police Department (SPD) employees. Since 2019, OPA has employed both sworn and civilian investigators. The office is led by a civilian director and civilian supervisors, and investigations are carried out by a mix of civilians (civilian investigators) and sworn SPD sergeants (sworn investigators).¹

OIG must annually examine the impact of OPA civilianization efforts on OPA processes and outcomes for complaint investigations.² OIG published reports in 2023 and 2024 comparing OIG certifications for investigations led by sworn and civilian investigators. Those reports emphasized key limitations to OIG analysis of OPA civilianization, mostly relative to available sample size of data. Specifically, the Seattle Police Officer Guild (SPOG) collective bargaining agreement (CBA) restricts the number and role of civilian investigators and there have been high attrition rates for civilian investigators.

Like the previous two reports, the assessment of OPA civilianization continues to be limited by CBA restrictions and OPA hiring capacity. This report includes insights, obtained by OPA staff interviews, into the motivation of OPA investigators for their oversight work, their understanding of OPA civilianization, and their experiences and opinions on the dynamics of working with investigators from both sworn and civilian backgrounds.³

Key insights are as follows:

- Civilian participants cited disparity in compensation and benefits between sworn and civilian positions as a challenge.
- Sworn participants felt underrepresented by upper-level OPA leadership due to the absence of sworn supervisors.
- Both sworn and civilian participants identified the need for OPA to provide appropriate interview training.

Recommendations

- Recommendation 1: OPA should support efforts to reduce the disparity in compensation and benefits between OPA sworn and civilian personnel.
- Recommendation 2: OPA should provide staff with appropriate interview training.
- 1 OPA Internal Operations and Training Manual.
- 2 Seattle Municipal Code 3.29.270.D.
- 3 Appendix A of this report presents a summary of all OPA investigations certified by OIG between 2022 and 2024. Period selection is based on the availability of civilian and sworn investigators at OPA. Although OIG reports periodically on the number of certified investigations, Appendix A presents detailed information preceding certification.



OPA Sworn and Civilian Investigators Qualifications

The general organizational structure of investigative agencies can vary. In small jurisdictions, an investigative agency may be staffed by a single investigator or consultant. Others may be governed by a volunteer board and supported by a professional staff of investigators. Statutes authorizing a mix of sworn and civilian staff vary in scope. Some agencies prohibit hiring officers who have been previously employed by the overseen department; others allow the employment of officers from the overseen department after three or more years have passed; others do not specify policies related to the hiring of previous law enforcement officers (LEOs).⁴

OPA is a uniquely structured agency, because it employs a mix of civilians and sworn SPD sergeants. Civilian investigators are required not to have been formerly employed as sworn members of SPD. Sworn investigators are rotated into OPA from SPD to maintain continuity, preserve investigative experience, and support the operational effectiveness of both agencies.⁵ OPA's parameters for sworn investigators are:

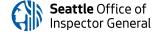
- Rank of sergeant;⁶
- Fixed assignment term of two years; and
- No sustained OPA complaints involving dishonesty or integrity.⁷

SPD Chief and OPA Director coordinate to ensure assigned sworn investigator possesses specific or desired skills and qualifications. Some of the similar qualifications for both civilian and sworn investigators at OPA include:

- Ability to manage cases effectively;
- Experience conducting misconduct or complex investigations;
- Strong analytical skills;
- Ability to maintain objectivity and produce high-quality written reports;
- Ability to work with minimal supervision; and
- Strong organizational and time management skills.

While sworn and civilian investigators share similarities in qualifications, the sworn investigator position focuses on patrol and general investigative experience, whereas the civilian investigator position prioritizes specialized investigative experience, and knowledge of case law.

- 4 Table 3 in Appendix B compiles the investigation-focused oversight agencies along with their policies for employing LEOs.
- 5 Ordinance 125315, § 3.29.140(E).
- 6 Ordinance 125315, § 3.29.430(G). SPOG CBA Appendix D (5): Acting Sergeants currently on the Sergeant promotional roster may serve in OPA to fill a temporary vacancy limited to three (3) months. While at OPA, Acting Sergeants shall only perform intake duties and may be paired with a Sergeant to assist in investigations.
- 7 SPD Manual, Tittle 5 Employee Conduct, 5.001 Standards and Duties.
- 8 Ordinance 125315, §3.29.430(G).
- 9 See a summary of OPA investigators in Appendix C. See the civilian job postings in the <u>2020 Job Bulletin</u> and the <u>2025 Job Bulletin</u>.



OPA Personnel Challenges

Collective Bargaining Agreements

The City of Seattle (the City) has two unions for sworn officers, Seattle Police Management Association (SPMA) and SPOG. CBAs are negotiated separately for each union. CBAs govern a variety of employment matters including wages, hours, and working conditions. CBAs also govern elements of oversight and accountability, including the number of civilian investigators and types of investigations civilian investigators may conduct.

Figure 1 shows the timeline of the Accountability Ordinance and the agreements between the City and the SPD CBAs.

Number of civilian investigators. Per ordinance, the OPA director, deputy director, and supervisors are required to be civilian. The ordinance also requires that investigators be entirely civilian or a mix of civilian and sworn. However, the SPOG CBA limits the mix of civilian and sworn investigators. Since June 2024, the CBA between the City and SPOG only allows for up to four civilian investigators.

Types of investigations. The role of civilian investigators is determined and limited by the CBA. Cases that could reasonably lead to an officer's termination must be assigned to a sworn investigator.¹³

State law does not prohibit law enforcement CBAs from limiting the authority, composition, or responsibilities of civilian oversight entities established by local jurisdictions. In the City, CBAs supersede ordinances, potentially limiting some existing accountability ordinance provisions.

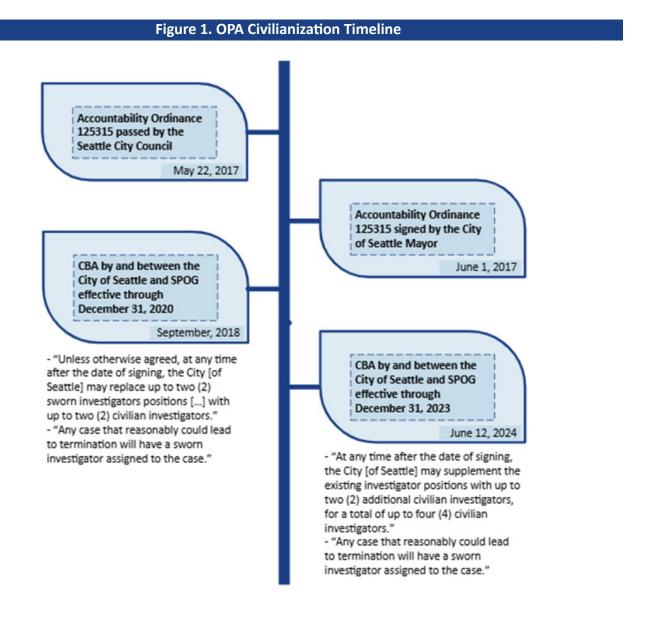
Although the current system does not prevent law enforcement unions from negotiating limits on civilian investigators, it can be influenced by various stakeholders and processes. The CBA negotiation process involves:¹⁴

- The City identifying priorities for the negotiation and receiving parameters for bargaining issues from the Mayor and the City Council.
- Finalizing parameters through the City Labor Relations Policy Committee.
- City Council voting to ratify or reject the contract.
- Mayor signing the contract if ratified.

The interaction and involvement of state law, the Seattle Mayor and Council, and SPD CBAs is important to understand OPA's staffing limitations and for identifying leverage points in future negotiations that could advance the City's civilian oversight model.

- 10 Ordinance 125315, § 3.29.140(A).
- 11 Ordinance 125315, § 3.29.140(C).
- 12 SPOG CBA effective through December 31, 2023. Appendix D.
- 13 SPOG CBA effective through December 31, 2023. Appendix D.
- 14 Simplified summary of CBA negotiation process provided for contextual clarity within the scope of this report. SPOG
 Contract People Power Washington.

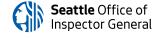




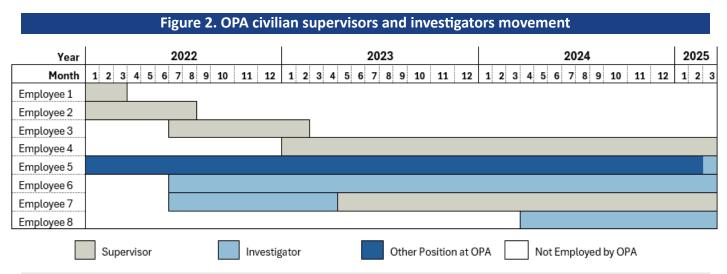
Attrition Rates and Compensation

In addition to SPD CBAs' limitations on the number of civilian investigators and the type of investigations they can conduct, OIG's 2023 and 2024 reports also highlighted the disparities in salary between OPA's sworn and civilian staff and attrition rates. Sworn investigators' salaries are higher than civilian investigators' salaries. Sworn investigators averaged a base annual salary of \$162,240.00, compared with \$135,510.00 for civilian investigators. Sworn investigators' salaries are also higher than their civilian supervisors by \$10,650.00 (\$151,590.00). 15

¹⁵ City of Seattle Wage dataset found at <u>City of Seattle Open Data portal</u>. Annual salary based on the average hourly rate of all 2024 OPA investigators and supervisors. Data retrieval on March 24, 2025.



Civilian staff attrition within OPA has fluctuated over the past three years. Figure 2 shows the movement of civilian supervisors and investigators from January 2022 to March 2025. During this period, OPA employed two civilian investigators up until July 2022, while civilian supervisors were overseeing cases led by sworn investigators. From May 2023 to April 2024, OPA operated with only one civilian investigator for eleven months. By March 2025, OPA was staffed with three civilian investigators. Although Figure 1 shows that SPD CBA provisions changed the limit of civilian investigators from two to four, it took eight months to employ a third investigator.



Source: SPD Employee Movement Tracker. Except for employee 5, employee names were gathered from OIG's internal system, which logs the names of investigators and supervisors assigned to cases certified by OIG. Any civilian employee that reached the assistant director's level position or above was excluded from this table.

OPA Investigators Focus Group

OIG conducted semi-structured focus group interviews with various OPA staff for this report. Participants discussed their motivation for oversight work, their understanding of OPA as a civilian-led agency, and reflections on the mixed staffing model. This section outlines the perspectives and experiences of participants, and, as such, does not represent the views of OIG.

Methodology

OIG invited the following OPA staff to participate in the focus groups: two civilian supervisors, three civilian investigators, and seven sworn investigators. OIG conducted three semi-structured focus group interviews with the seven OPA staff members who responded. The following is a breakdown of the focus group participants:

- 2 civilian supervisors
- 2 sworn investigators
- 3 civilian investigators



Participants represent 58% (7) of all standing OPA investigators and supervisors. Investigator participants have served anywhere between one month and three years as OPA investigators, with average serving 22 months. ¹⁶ It is important to note that two out of seven OPA sworn investigators volunteered to participate in the interviews. Therefore, their opinions should not be assumed to represent the overall views of sworn investigators.

The interviews were conducted by providing participants with open-ended questions in a freestyle discussion format. The questions were based on interview themes formulated from an analysis of the current City's oversight system, research about civilian oversight, and OIG previous reports.¹⁷ The themes and questions were the following:

Job appeal: motivation for oversight work

- What motivated you to work for OPA?
- What do you like about your role as an OPA investigator?
 - o What are the challenges?

Understanding of OPA as a civilian-led agency

- What do you think is the purpose of having both sworn and civilian investigators at OPA?
- In your opinion, what benefits, if any, does the police accountability system gain from having civilians or a mix of civilian and sworn staff conducting investigations?
 - o What are the downsides, if any, of having civilians or a mix of civilian and sworn staff conducting investigations?

Reflections on investigator skillset

- What skills and qualities are important to conduct an effective investigation?
- Have you observed any differences in the skillsets of sworn and civilian personnel investigating complaints?
- Have you noticed any differences in the quality of the investigations conducted by sworn and civilian personnel?

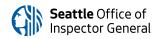
Summary

Motivation for Oversight Work

Civilian supervisors and investigators come from diverse backgrounds with varying levels of experience and skillsets, but all have a foundation in criminal justice or law enforcement. In describing their motivation for oversight work, civilian investigators were drawn to their positions due to their backgrounds and understanding of the impact of policing on the community. Sworn investigator participants also recognized the importance of the assignment and the value of police oversight. Sworn investigator participants believed that, among all cases received by OPA, only a small portion are valid or justified but emphasized that those legitimate cases contribute significantly to police accountability.

16 SPD Employee Movement Tracker, last access June 9, 2025.

17 OIG 2023 and 204 Annual study of sworn and civilian staffing.



When discussing what they liked about their role, investigator participants agreed that conducting investigations is both demanding and rewarding. They appreciated the ability to be thorough and expansive on cases and enjoyed the challenge of demonstrating how cases remain unbiased, ensuring every step of the process contributes to a comprehensive and objective understanding.

Challenges of the Role

When asked about the challenges of their role, each group identified unique obstacles. However civilian supervisors and investigators shared a common challenge: limitations imposed by SPOG on the hybrid system.

Challenges for Civilian Staff

Civilian participants, both investigators and supervisors, noted CBA restrictions on the number of civilian investigator positions, and the types of investigations civilians can conduct. They felt this undermines both civilian investigators' efficacy as professionals as well as their legitimacy in the eyes of sworn officers they interview.

The 180-day deadline for investigations was identified by civilians as an additional challenge. The SPOG CBA states that no discipline may result from the investigation if the investigation of the complaint is not completed within 180 days. ¹⁸ Civilian participants felt that the 180-day deadline should start when OPA receives the complaint, but reported that it often starts earlier. ¹⁹ They saw this deadline as preventing them from having enough time to complete an investigation, and in some cases, from holding named employees accountable.

Challenges for Civilian Investigators

Civilian investigator participants also identified feeling inherent distrust from officers they investigate or interview. They noted that some SPD officers perceive civilian investigators as lacking an understanding of their work, leading officers to doubt their ability to conduct impartial and informed investigations.

Participants also felt challenged by community expectations. Some community members demand safety and accountability but also prefer to remain anonymous, which can limit an investigator's ability to obtain sufficient information to conduct a thorough investigation. Participants expressed that although OPA could take a more proactive approach by engaging directly with the community, civilian investigators felt constrained in their ability to conduct fieldwork due to organizational concerns regarding their safety. Sworn investigator participants elaborated that police officers frequently encounter individuals in crisis; police officers learn specific skills to ensure the safety of the officer and the well-being of the person in crisis. Some civilian investigators lack that training and experience, preventing them from seeing the potential risks.

Challenges for Civilian Supervisors

Aside from the limitations imposed by SPOG on the hybrid system, civilian supervisor participants also highlighted the challenge of disparity in compensation and benefits between sworn and civilian employees at OPA. They noted sworn investigators receive higher salaries, in addition to retirement benefits and overtime compensation that civilian supervisors do not receive.

18 SPOG CBA Article 3, 3.6 (B). 19 Ibid.



In comparison to sworn investigators, civilian supervisor participants expressed concerns about lacking civil protection, union representation, and regular pay increases.

Challenges for Sworn Investigators

Sworn investigator participants identified their main challenge as working under "all civilian bosses" who lack law enforcement experience. They explained they frequently find themselves needing to clarify situations for civilian supervisors that would require little or no explanation for sworn supervisors.

Additionally, sworn investigator participants acknowledged feeling underrepresented by OPA upper-level leadership, as there are no sworn staff members in those positions. As a result, they felt leadership does not reflect their perspectives and expressed concerns about the lack of support in advocating for their perspective.

Participants felt there is a "missing-link" due to the absence of a mix of civilian and sworn supervisors in OPA. Sworn investigator participants felt their "full answers" are not fully communicated by civilian supervisors to leadership.

Perspectives on OPA's Hybrid Investigative Model

Both civilian and sworn staff's discussion regarding the purpose of the mixed staff investigative model at OPA focused on the following:

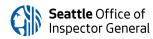
- Public trust and transparency
- Diverse perspectives
- Holistic agreement on benefits of hybrid system

Participants believed that a mixed group of investigators at OPA garners support from all parties. They expressed that the hybrid system helps create "buy-in" from sworn officers and community for the accountability process and outcomes. They believed that the process is fair, unbiased, and legitimate when all parties are involved. Civilian participants emphasized the importance of OPA being civilian-led for fostering public legitimacy. Participants believed that civilians at OPA provide assurance to the community that officers are not investigating themselves, while the presence of sworn investigators provides sworn officers with confidence that allegations against them are being reviewed by both sworn and civilian staff. Additionally, sworn investigator participants emphasized the importance of their presence in OPA to ensure sworn officers feel represented within the organization.

Overall, participants believed that having sworn and civilian investigators at OPA contributes to diverse perspectives and case analysis, helping to overcome deficiencies that could arise if OPA were staffed entirely by sworn or civilian personnel. They expressed sworn investigators bring internal knowledge that civilian investigators may lack, such as years of experience about SPD policies, procedures, and appropriate departmental contacts. Participants also reported that civilian investigators bring a broader lens for identifying recurring issues, particularly in cases related to use of force and professionalism.

When asked about downsides of the current OPA mixed staff, neither civilian nor sworn investigators participants noted any significant drawbacks to the hybrid model. However, they acknowledged differences in the learning curve between civilian and sworn investigators when adapting to the role.

A common challenge identified by civilian investigators and supervisors was public trust, though this was



also noted as a benefit in earlier discussions. Participants expressed that while the community generally supports OPA civilianization, public perception remains a challenge due to concerns about bias, given that OPA is not fully civilianized.

Investigator Skillsets and Quality of Investigations

OPA staff participants were asked to share their views on the most relevant skills and qualities for conducting effective investigations. Civilian investigator participants emphasized the importance of essential soft skills, including respect towards community members and officers, treating all individuals with dignity, and showing compassion toward complainants.

Regarding professional skills, participants highlighted key competencies such as strong report-writing experience, knowledge of law and SPD policies (e.g. use of force; search and seizure policies), communication skills, time management, attention to detail, and resourcefulness.

Both civilian and sworn participants emphasized the importance of interview experience. Civilian supervisor participants noted that investigators must have the "strength" to conduct interviews effectively and navigate situations where officers may be resistant to cooperating or where complainants "come in with trauma or in crisis."

Furthermore, sworn investigators participants underscored the need from SPD and OPA to provide training on interview skills. They elaborated on how strong interview skills are important for conducting a thorough investigation and criticized current OPA training, arguing that it does not sufficiently prepare investigators to interview complainants, SPD's named employees, and witnesses.

All participants were emphatic that differences exist in skillsets between sworn and civilian personnel conducting investigations. Civilian investigator participants believed these differences reflected variations in background, education, and experience. Civilian supervisors and sworn investigator participants reported that skillset differences are due to the breadth of sworn personnel's experience and the volume of cases they have handled. However, sworn investigator participants also recognized that experience levels vary even among sworn officers, as some are transferred to OPA immediately after becoming sergeants.

Civilian supervisor participants further elaborated that while sworn investigators enter the role with an initially stronger skillset, this does not necessarily indicate greater professional potential.

Differences in the Quality of Investigations

Regarding differences in the quality of investigations, sworn investigator participants declined to provide detailed feedback, as they felt they had insufficient exposure to civilians' work. However, they noted that in cases where they had interacted with civilian investigators' work, they have been satisfied overall.

Civilian participants expressed that both groups bring different strengths to investigations. They noted that sworn investigators tend to identify issues that civilian investigators might overlook, and vice versa. Additionally, participants acknowledged that investigators in each group may possess expertise on specific topics, contributing to the overall investigation process.



Sworn Investigator Perspectives on Objectivity and Accountability

Sworn investigator participants expressed concerns about the objectiveness of OPA cases. They worried that objectiveness in cases is often misinterpreted as being fair solely to community members, rather than to all parties involved. Sworn investigator participants felt they play a central role in maintaining objectiveness for named employees.

These participants noted accountability for sergeants, lieutenants, and especially captains and above, is often diminished, whereas patrol officers are more often held accountable. They expressed that everyone, from the chief of police to a student officer, needs to be held equally accountable. They believed the same timeline should exist for all investigations regardless of the rank of the officer, and that differences in complaint handling for command staff reduces credibility in OPA.

Sworn investigator participants believed the current structure of the accountability system has decreased SPD's ability to hold officers accountable, as grievances often result in complaints filed with OPA rather than internally addressing issues through counseling, coaching, or other means.

Conclusions

OPA Employees' Challenges

Consistent with OIG reports, civilian participants expressed CBA limitations impact their roles by restricting the type of investigations they can conduct. They also identified disparities in compensation and benefits, compared to their sworn counterparts, as disadvantages of their positions. Sworn participants also shared their unique challenges, feeling underrepresented by upper-level OPA leadership due to the absence of sworn supervisors.

Recommendation: Review and address these challenges in future CBA negotiations.

Opinions About the Hybrid System

Most participants agreed that the hybrid system helps foster the trust of the community in OPA process and outcomes, brings diverse perspectives, and encourages buy-in from all the involved parties. However, civilian participants noted that public perception remains a challenge due to concerns about bias with sworn investigators. Although the mix of investigators contribute to different perspectives, this can be limited by the learning curve encountered by newly hired civilians and sworn personnel who are newly-assigned sergeants.

Investigators Skillsets and Quality of Investigations

Both civilian and sworn participants highlighted the importance of prior interview experience for investigators. They emphasized the need to conduct interviews effectively, especially in situations where officers may be resistant to cooperating or complainants must discuss sensitive incidents. Although OPA offers interview training through the Federal Bureau of Investigations Law Enforcement Executive Development Association (FBI-LEEDA) and other programs oriented to law enforcement agencies, participants stressed the importance of training that prepares staff for the distinct roles and objectives of each interview (complainants, witnesses, named employees).

Recommendation: OPA should provide staff with appropriate interview training.



Conclusion and Next Steps

There is near unanimity among OPA participants that sworn SPD sergeants play a key role in the police oversight system. However, it remains unclear the appropriate level of civilianization. CBA limits on the number and role of civilian investigators and OPA's attrition rates from previous years as well as salary and benefits disparities hinder an equitable assessment of the topic.

While OIG recognizes the importance of evaluating the effectiveness and impact of OPA's civilian and sworn staffing mix, a feasible assessment is limited given the limitations on civilian investigators. Until a change in the current oversight system occurs, OIG will focus its work on monitoring changes in the number of OPA investigators and conducting research on this topic to analyze best practices on civilian-led investigative oversight agencies. OIG will provide recommendations on the mix of OPA sworn and civilian staffing when appropriate.



Appendix A

OIG Review and Certification of OPA Investigations

This appendix reports OIG's review and certification of cases conducted by OPA civilian and sworn investigators from 2022 to 2024. As some months of 2023 and 2024 had one civilian investigator, outcomes are presented in aggregate to ensure a group assessment instead of comparing an individual to a group.

Misconduct complaints against SPD officers may be filed by community members, and other City employees (including SPD employees). The OPA Director or their designee may initiate a complaint based on a claim made against the City, litigation filing, media coverage of an incident, or any other source of information.²⁰

Following an intake investigation, OPA determines whether the allegations, if proven, would violate laws, SPD's policies, or training. If so, OPA classifies the complaint into one of the following: contact log, supervisor action, investigation, and expedited investigation.²¹ While OIG reviews all OPA classifications, it only makes certification determinations on the investigations and expedited investigations.

Investigation. OPA investigates alleged violations of SPD policy, such as allegations of unnecessary or excessive force or biased policing.²² Investigations may include interviewing the complainant and involved officer(s), identifying, and interviewing independent witnesses, and collecting and reviewing additional evidence.

Expedited Investigations. Investigations where "[...] findings can be reached on the intake investigation, and no further investigation needs to be included."²³ This type of investigation should not be utilized for cases where one or more of the following are present:

- A lack of video depicting relevant and material issues or fact or elements of the alleged misconduct.
- Multiple unrelated allegation types involving two or more named employees.
- Complex or confusing fact patterns.
- Cases involving matters of significant public concern.²⁴

After OPA investigations are completed, OIG reviews investigations, directs any additional investigation, and makes certification determinations on investigations. OIG reviews and certifies investigations for thoroughness, objectiveness, and timeliness.²⁵

- 20 OPA Internal Operations and Training Manual.
- 21 Please refer to OPA manual for contact log and supervisor action definitions.
- 22 Ordinance 125315, § 3.29125(A).
- 23 OPA Internal Operations and Training Manual.
- 24 OPA Internal Operations and Training Manual.
- 25 Ordinance 125315, § 3.29.260(C).



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

Thoroughness. Each allegation has been addressed, and the information gathered is sufficient to support a determination of findings.

Timeliness. OPA has met all contractual and statutory timelines.

Certification outcomes are:

- Fully certified. Investigation is thorough, timely, and objective;
 - Fully certified with notes. Investigation is thorough, timely, and objective. This type
 of certification includes minor annotations related to issues encountered in the
 investigation;
- Partially certified. Investigation is certified as one or two of thorough, timely, and objective; and
- Not certified. Investigation is not thorough, timely, and objective but additional investigation is not requested or directed; or not certified because the investigation is not thorough and objective, along with any requested or directed further investigation to be conducted by OPA.²⁶

OPA Investigations and Expedited Investigations

Between 2022 and 2024, full certification of OPA investigations occurred in 90.4% (510) of cases; 9.6% (54) received partial certification. OIG formally requested or directed further investigation for 8.16% (46) of investigations because the information provided in the first submission was insufficient to determine a certification resolution.

Regarding expedited investigations, 96.8% (388) cases received full certification and 3.2% (13) partial certification. Except for one case, all expedited investigations received partial certification after the first submission. In those cases with full certification, OIG requested or directed further investigation in 4% (16) of investigations.

Requests for Additional Investigation

Figure 3 displays the number of requests for additional investigation by category between 2022 and 2024. 73% of requests were related to the thoroughness of cases. Specifically, edits on the report of investigation (ROI) or summary intake, missing documentation or allegations, and including additional evidence. 23% of requests were related to the objectiveness of cases, such as additional interview information or missing interview information, and deviation from OPA manual.

26 Ordinance 125315, § 3.29.260(F).

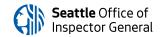
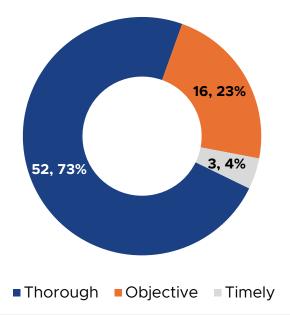


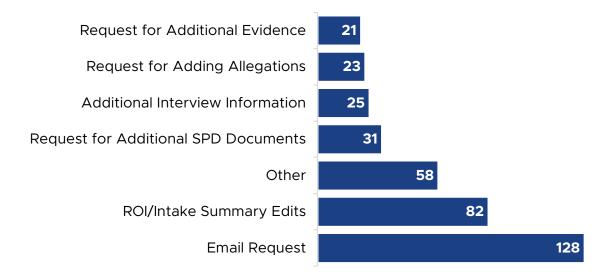
Figure 3. Number of Requests for Additional Investigation by Category Between 2022 and 2024



Source: OIG internal database. Percentage based on total number of requests.

Figure 4 shows the number of requests for additional investigation between 2022 and 2024. The majority were email requests, which refers to missing documents or minor requests that do not rise to a level of a formal memo. To a lesser extent, OIG requested edits and clarification on ROI and case intake summaries, and requests related to including additional interview information.

Figure 4. Type of Requests for Additional Investigation



Source: OIG internal database. One request for further investigation may include more than one type.



Partial Certifications

Table 1 tabulates the number of partial certifications to OPA investigations by category and year. Between 2022 and 2024, an average of 5.52% of investigations received partial certification. Most of the cases received partial certification due to issues related to the timeliness of investigations, most commonly, the 5-day notification period.²⁷

| Table 1. Partial Certifications to OPA Investigations by Category and Year | | | | | | |
|--|-----------|-----------|-----------|--|--|--|
| OPA Classification | 2022 | 2023 | 2024 | | | |
| Investigation | 22, 6.49% | 20, 5.87% | 12, 4.21% | | | |
| Not Timely | 18 | 15 | 8 | | | |
| Not Thorough | 6 | 4 | 3 | | | |
| Non-Objective | 2 | 1 | 1 | | | |
| Expedited Investigation | 3, 0.88% | 7, 2.05% | 3, 1.05% | | | |
| Not Timely | 3 | 7 | 2 | | | |
| Not Thorough | | | 1 | | | |

Source: OIG internal database.

OIG Notes on OPA Investigations

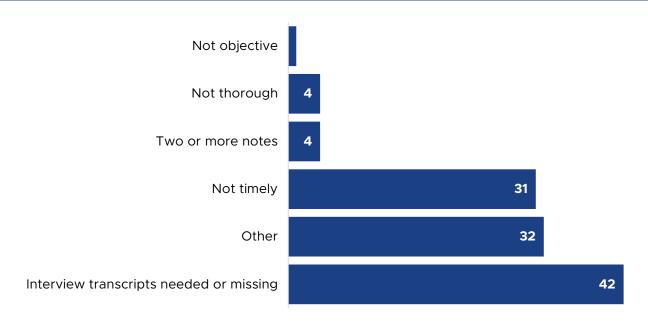
Notes are provided by OIG on areas for potential improvements in an investigation. Notes are not significant enough to impact full certification of cases. Between 2022 and 2024, OIG issued notes in 20.4% of fully certified investigations. In 2024 had the highest number and percentage of notes issued to investigations (46, 30.9%). OIG issued notes in 7% of fully certified expedited investigations.

Figure 5 displays the number of notes on full and partial certified investigations (expedited investigations included) between 2022 and 2024 by type. The most common notes were related to missing interview transcripts. Notes on timeliness mostly referred to partial certifications (90%) where the 30-day classification notice was sent late or the 180-day for officer discipline was missed. Except for 1 case, "other" notes were related to fully certified investigations, and covered a range of topics.

²⁷ Since June 12, 2024 the 5-day notification period was modified. SPOG CBA effective through December 31, 2023 states that "OPA shall: 1) if the complaint/case has been closed and no further investigative action will be taken, notify the named employee and the Guild of the receipt of complaint, including a copy of the complaint, and the disposition;"



Figure 5. Number of Notes on Certified Investigations by Type Between 2022 and 2024



Source: OIG internal database. One request for further investigation may include more than one type.

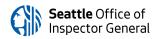
Appendix B

| | Table | e 2. Investigation-Focused Oversight | Agencies | | |
|--|--|--|------------------|---|----------------------------|
| Name | Overseen Department | Misconduct Allegations | Civilian Lead | Allowed to Employ Former LEOs | Employs Current LEOs |
| Citizen Complaint Review Board (CCRB) | New York Police Department (NYPD) | Only sworn officers of the NYPD. Allegations related to excessive or unnecessary force, abuse of authority, discourtesy, and offensive language. | Y | No policy/ not specified. | N |
| Civilian Office of Police Accountability (COPA) | Chicago Police Department (CPD) | Bias-based verbal abuse, coercion, death or serious bodily injury in custody, domestic violence, excessive force, improper search and seizure, firearm discharge, sexual misconduct, taser discharge that results in death or serious bodily injury, pattern or practices of misconduct, and unlawful denial or access to counsel. | Υ | Yes, but not formerly employed by the CPD within the last five years. | N |
| Office of Police Complaints (OPC) | Metropolitan Police Department (MPD) and/ or DC Housing Authority (DCHA) | Police officer misconduct related to harassment, inappropriate language or conduct, retaliation, unnecessary or excessive force, discrimination, failure to identify and failure to intervene. | Y | Yes, but not formerly employed by the MPD or the DCHAPD. | N |
| Department of Police Accountability (DPA) | San Francisco Police Department (SFPD) | Complaints against the SFPD and all SFPD officer-involved shootings. | Y | Yes, but not formerly employed by the SFPD. | N |
| Department of Inspector General (DIG) | Columbus Police Department (CDP) | Complaints alleging misconduct and/ or excessive use of force by sworn personnel of the Division filed by citizen or initiated by the Civilian Police Review Board (CPRB). | Υ | No policy/ not specified. | N |
| Fire and Police Commission (FPC) | City of Milwaukee (MPD), Fire Department (MFD) and Department of Emergency | Complaints alleging unauthorized use of force, discourtesy, disparate treatment, department procedures and department services. | Υ | Yes, but LEOs must be separated from sworn service for at least three years. | N |



| Name | Overseen Department | Misconduct Allegations | Civilian Lead | Allowed to Employ Former LEOs | Employs Current LEOs |
|---|---------------------------------------|---|------------------|--|----------------------------|
| Community Police Review Agency (CPRA) | Oakland Police Department (OPD) | Required to investigate complaints involving use of force, in-custody deaths, profiling based on any of the protected characteristics identified by federal, state, or local law, untruthfulness, and first amendment assemblies. | Y | Yes, but not formerly employed by the OPD. | N |
| Civilian Police Oversight Agency (CPOA) | Albuquerque Police | All civilian complaints alleging officer misconduct. | Υ | No policy/ not specified. | N |
| Independent Police Review (IPR) | Portland Police Bureau (PPB) | Allegations related on use of force, abuse of authority, discourtesy, unlawful search, biased policing, retaliation, false statements, and policy/procedure violations. | Υ | No policy/ not specified. | N |
| Office of Independent Monitor (OIM) | Denver Police Department (DPD) | Allegations of use of force, biased policing, improper stops, unlawful searches, sexual misconduct, strip searches, body-worn camera infraction, policy/procedure violations) | Υ | Yes, but not formerly employed by the DPD, Sheriff, or Fire Departments. | N |

Source: CCRB <u>investigator job posting</u> and <u>operating documents</u>; COPA <u>operating documents</u> and <u>investigator job posting</u>; OPC <u>statue and regulations</u>; DPA <u>website</u>; DIG <u>website</u>; FPC <u>website</u> and <u>investigator job posting</u>; CPRA <u>operating documents</u> and <u>investigator job posting</u>; CPOA <u>website</u>; IPR <u>statue</u>, <u>regulations and operating documents</u> and <u>job posting</u>; and OIM <u>operating documents</u> and <u>job posting</u>. Note: Yes(Y) and No(N).



Appendix C

Sworn Investigators

Minimum Qualifications:

- Ability to analyze complex information and reach logical conclusions based on evidence.
- Ability to weigh evidence and witness credibility.
- Objective and the ability to mitigate personal biases.
- Strong written and verbal communication skills.
- Strong interpersonal and collaboration skills.
- Ability to maintain confidentiality.
- Ability to complete tasks with minimal supervision.
- Strong interviewing skills.
- Proficiency with MS Outlook, Word, and Excel.

Desired Qualifications:

- Minimum one year of patrol experience as a sergeant.
- Prior investigative experience.
- Detective experience and/or demonstrated case management skills.
- Supervisory training, experience and/or demonstrated leadership skills.
- Post-academy training in interview techniques and/or a documented commitment to interviewing victims, witnesses, and suspects for preliminary patrol investigations.
- Strong organizational skills, time management abilities, and a proven record of meeting strict deadlines.
- Expertise with internal databases.

Civilian Investigators

Minimum Qualifications:

Graduation from an accredited college or university with a bachelor's degree PLUS six (6) years of experience conducting civil and/or criminal investigations that involved: collecting, analyzing, and evaluating evidence; conducting interviews; and producing detailed reports of investigations OR graduation from an accredited law school PLUS two (2) years of experience identified herein.

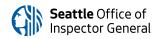
Desired Qualifications:

- Experience in law enforcement or as a detective, investigatory supervisor, and/or demonstrated skills in case management.
- Experience conducting misconduct or other complex investigations.



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- Ability to analyze records and information, weigh evidence and credibility of witnesses, and develop logical conclusions.
- Ability to maintain objectivity and mitigate the effects of personal bias.
- Strong written and verbal communication skills.
- A demonstrated interest in the field of police accountability.
- A demonstrated ability to produce high-quality written work despite short timelines.
- Ability to exercise tact and diplomacy in dealing with sensitive, complex and, at times, highly-charged issues and situations.
- Knowledge of case law pertaining to use of force and search and seizure issues.
- Two plus years of experience investigating, prosecuting or defending felony criminal cases.
- Prior employment as a sworn law enforcement officer.



Appendix D

Civilian Investigators

Opening Script

Thank you for taking the time to speak with us today. We are speaking with OPA supervisors and investigators to collect reflections on their experiences, motivations, and perceptions of oversight work, as well as their understanding of OPA as a civilian-led agency.

This interview will last about one hour. Although we will be taking notes, your responses will not be quoted, and our conclusions will only be shared with stakeholders in the aggregate. Do you have any questions or concerns before we begin?

Job appeal: Motivation for oversight work

- What motivated you to work for OPA?
- What do you like about your role as an OPA investigator?
- What are the challenges?

Understanding of OPA civilian-led agency

- What do you think is the purpose of having both sworn and civilian investigators at OPA?
- In your opinion, what benefits, if any, does the police accountability system gain from having civilians or a mix of civilian and sworn staff conducting investigations?
- What are the downsides, if any, of having civilians or a mix of civilian and sworn staff conducting investigations?

Reflections on investigators skillset

- What skills and qualities are important to conduct an effective investigation?
- Have you observed any differences in the skillsets of sworn and civilian personnel investigating complaints?
- Have you noticed any differences in the quality of the investigations conducted by sworn and civilian personnel?

Closing

- Is there anything else you'd like to add?
- Do you have any questions for me? This concludes our discussion. Thank you for your time.



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Appendix E

Acronyms, Initials, and Abbreviations

CBA: Collective Bargaining Agreement

LEO: Law Enforcement Officer

NACOLE: National Association for Civilian Oversight of Law Enforcement

OIG: Office of Inspector General

OPA: Office of Police Accountability

ROI: Report of Investigation

SPD: Seattle Police Department

SPMA: Seattle Police Management Association

SPOG: Seattle Police Officer Guild

The City: The City of Seattle

