

SOURCE	REPORT	RECOMMENDATION	RESPONSE
Portland Copwatch	Entire Report	Putting paragraph numbers being analyzed at the beginning of paragraphs analyzing them would go a long way to making the report more readable/trackable, since recommendations summarizing the paragraphs only appear at the end of each section.	As the report is designed to be an evaluation of PPB and the City's overall systems, certain Settlement Agreement paragraphs are discussed in multiple places and/or are discussed out of order. Where appropriate, we include paragraph numbers in parentheses, oftentimes with a summary of the Settlement Agreement language. We believe that adding SA paragraph numbers as a header each time they are discussed would unnecessarily clutter the document when the SA paragraph numbers are already referenced in the text.
Portland Copwatch	Report and Appendices	Analysis of certain paragraphs (#116a, b, and c about the Employee Information System, for example at Appendix VII-2) do not explain the substance of the paragraphs.	Due to the large amount of information contained within the report, we refrained from including the Settlement Agreement language as this would have made the report even larger. In many places, we included a summary of the SA language or provided select excerpts. For our reports in 2018 (which will be topic-focused), we will include the Settlement Agreement paragraph language.
Portland Copwatch	Report and Appendices	Sometimes a reference is to a small part of a long document, and yet the entire document is included rather than an excerpt with a link to finding the longer document. This makes finding the information referenced in the main report difficult to find.	When including the appendices, we decided to provide the entire document, as this would allow the excerpt to be read in context.
Portland Copwatch	Appendices	Appendices VI-3 and VI-13 are duplicates of one another.	We have revised our report to correct this issue.
Portland Copwatch	Pg. 2	There is no overall report card in the introduction showing general progress of each major section.	We have revised our report to include an overall report card.
Portland Copwatch	Pg. 3	The sentence that begins "Although verbatim changes to Directive 1010.00...." is confusing. It should probably be split into two parts. "Verbatim changes... comply with the language of the Settlement Agreement. However, the PPB is expected to implement...."	We have revised our report to address the confusing language.
Portland Copwatch	Pg. 6; 74-75	As we have noted before, COCL should refrain from referring to the ambulance service (generic) as "AMR" which is a specific company that holds the contract right now. Portland Fire and Rescue and others are in dispute over AMR's contracting so generic reference is better in this instance. See Willamette Week, 10/4/17: http://www.wweek.com/news/2017/10/04/multnomah-county-is-pressing-for-big-changes-in-portlands-response-to-911-medical-calls-that-doesnt-sit-well-with-powerful-unions/	At present, because no entity other than AMR is responsible for transferring those in mental health crisis, we have not changed our report. If, in the future, AMR is no longer responsible for transporting those in mental health crisis, we will note that in our report, as that would have implications for PPB's and the City's transfer policies and procedures.
Portland Copwatch	Pg. 6	This is the first mention of the Behavioral Health Coordination Team (BHCT), which is not listed in the appendix and isn't clearly noted as a Portland Police project.	We have revised our report to identify BHCT as a PPB project and include it in the acronym appendix.
Portland Copwatch	Pg. 9; 117-119	It is not clear from references here and elsewhere in the report that the COCL is aware the Independent Police Review (IPR) used to conduct complainant surveys prior to 2010 but stopped because they didn't like the outcomes. (See for example the 2009 report at page 31: http://www.portlandonline.com/auditor/index.cfm?c=27727&a=302553 .)	In our 2016 Q1/Q2 Report, we discussed how prior complainant survey efforts had minimal organizational utility. As such, we are aware of IPR's prior efforts and will continue to assist in the development of future surveys because of their utility when properly designed and implemented.
Portland Copwatch	Pg. 12, 48, 72-73, 97, 106-107, 120-123, 130-132	Scorecards do not indicate the substance of the paragraphs that are in compliance, rendering them meaningless without having the Agreement in hand or scouring the text to cross-reference.	Due to the large amount of information contained within the report, we refrained from including the Settlement Agreement language as this would have made the report even larger. In many places, we included a summary of the SA language or provided select excerpts.

Portland Copwatch	Pg. 17-18	Because of the de-identifying, the story about the officer telling a person he/she would be "pissed off if he forced me to hurt his dog" is confusing.	We have revised our report to address the confusing language.
Portland Copwatch	Pg. 18-19	Though the text suggests there should be a way to call out experienced officers who use force unnecessarily (and thus did not "develop skills over time"), there is not a corresponding recommendation in the box on p. 39.	In the Recommendations box on page 39, we state that the evaluation of force "should include whether an officer's experience should have led the officer to choose actions that would have avoided the force."
Portland Copwatch	Pg. 33	"Category II-IV" uses of force subject to After Action Reports are not explained.	We have revised our report to clarify Category II-IV uses of force.
Portland Copwatch	Pg. 34-35	Supervisor checklist: Even though COCL states it is unclear whether supervisors are trained on evaluating required information in the After Action Reports, paragraph 72 is listed as being in "Substantial" compliance.	Par. 72 requires PPB to develop and use a supervisory checklist. As PPB incorporated the supervisory requirements of the policy section into the supervisory checklist, we feel they have substantially complied with Par. 72. Training on the supervisory requirements of the policy section have not been found in substantial compliance, and we feel Portland Copwatch's comment is more appropriately directed at those sections.
Portland Copwatch	Pg. 40-42	The report says Phase II of Force Audits will not include "minor omissions," but will only flag deficiencies if the overall writing is deficient. Is that consistent with the Settlement Agreement? Who decides what is minor?	PPB's Phase I methodology will continue to evaluate and code each individual omission. However, officers will not receive an EIS entry for minor omissions - only when there are substantial omissions. This decision is part of the Phase II methodology, which is conducted by the Inspector but which COCL will also review.
Portland Copwatch	Pg. 44-46	Mention of officer injuries and cost to the city in Quarter 2 does not provide any data to illustrate the point.	We mention the evaluation only as an example of the type of analyses which PPB is conducting.
Portland Copwatch	Pg. 50	COCL finds PPB in "substantial compliance" on Paragraph 79 because... they created a feedback survey on Enhanced Crisis Intervention Team (ECIT) training and the PPB is "taking [the] Needs Assessment seriously." This seems far too generous.	Paragraph 79 requires that PPB update its Training Plan annually by conducting a thorough needs assessment. Based on our review, we believe the PPB has continued to conduct a comprehensive needs assessment.
Portland Copwatch	Pg. 52-53	There are references to using the Kirkpatrick model to evaluate training but the report doesn't list the four areas that model examines.	On page 52, we identify officers' reactions to training, learning, and on-the-job outcomes as key elements to the Kirkpatrick Model. We do not discuss organizational change because it is extremely difficult to assess as the result of in-service training exclusively.
Portland Copwatch	Pg. 54	It is not explained why officers disagreed with changes made to the policy on pursuits.	We have revised our report to clarify this. Briefly, some officers felt that the policy restricted their ability to pursue suspects that would otherwise escape.
Portland Copwatch	Pg. 55-56	It is not explained what happens if an officer is no longer allowed to take the knowledge test a second time after failing to pass.	If an officer is not able to pass the knowledge check a second time, they are required to go through the training again and/or would receive individualized training on the subject.
Portland Copwatch	Pg. 55-56, 58-61	The COCL declined to describe the scenarios in training because not all officers had taken the classes. If they are finished before this report is finalized, will the final version contain a description? Or will a full description be in the next report? Otherwise the community has no way to know on what issues the police are training.	The COCL made a decision to withhold this information in the interest of high-quality training. These scenarios or portions of them may be repeated in 2018 and discussing them now would undermine their effectiveness. We have alluded to the training issues without disclosing the details of the training.

Portland Copwatch	Pg. 57	Recommendations box refers to "behavioral outcomes" which isn't a clearly defined term in this report.	Behavioral outcomes are used to measure the impact of training on on-the-job behaviors. Such outcomes can include the appropriate application of force and de-escalation techniques, official complaints and other potential indicators of on-the-job performance. We've also recommended contact surveys as a way of measuring on-the-street behavior.
Portland Copwatch	Pg. 58-61	Does the training on constitutional force which talks about when the officer may be held liable note that the City pays out of pocket if the officer is acting "under color of law?" How can the Bureau emphasize that even though officers are not personally held liable that they should not commit acts which may not get them fired but could still cost the city money?	We do not recall any discussion of this issue in the training on force. We appreciate the point being made and will bring it to the attention of the training administration.
Portland Copwatch	Pg. 69	ADORE system is mentioned but not defined, as is the term "FTO."	FTO has been defined in the revised report as Field Training Officer, the officer responsible for on-the-job training of new probationary officers. ADORE system is the Field Training software used by PPB. Among other functions, this software keeps track of assignments and rotation of probationary officers through five phases of FTO training. We have added both to the abbreviations section of the report.
Portland Copwatch	Pg. 71	The report lays out four points being reviewed and then summarizes #3 before #2, which is confusing.	We have revised our report to address this issue.
Portland Copwatch	Pg. 78	The Behavioral Health Unit (BHU) earns high praise, despite a lack of usable data to prove their effectiveness, which is not mentioned in the recommendations box.	The BHU as a unit structure works as intended, with multiple approaches to law enforcement interaction with persons with mental illness. Although PPB has yet to evaluate ECIT as a model of mental health response, BHU has a variety of data (quantitatively and qualitatively) which it uses to inform operations.
Portland Copwatch	Pg. 81-87	In several places there are references to outcomes on ECIT and Behavioral Health Response Team (BHRT) calls which include "completed" and "other" which are not defined.	These terms have been defined in previous reports. Completed indicates the call was completed without a report or action taken, while Other indicates an outcome not captured in another category.
Portland Copwatch	Pg. 89	It's not clear that describing the Service Coordination Team as a "cost-effective" way to impact the cycle of re-offending is the best way to express wishing to help persons in need.	While we understand Portland Copwatch's sentiment, cost-efficiency in any tax-payer funded program is an important consideration, including those seeking to help persons in need.
Portland Copwatch	Pg. 92-95	It is confusing that the analysis says information about mental health calls will be in the text of a data entry, but then it also says there is not mental health information noted in the narratives.	We have revised our report to address the confusing language. Mental health information <i>may</i> be included in the text, but it is an unreliable source of information.
Portland Copwatch	Pg. 95	It is not clear what COCL means when asking that "BOEC [the Bureau of Emergency Communications] enhance work with PPB as a system partner."	As a Memphis Model CIT program is designed to facilitate collaboration between police and emergency communicators, we are recommending this relationship be enhanced.
Portland Copwatch	Pg. 91-103	Mentions that officer evaluations in Directive 215.00 have not been finalized, and refers to training supervisors for *semi-annual* evaluations. However, the draft of 215.00 indicates the Bureau plans to cut evaluations to just once a year-- something Portland Copwatch opposes, and we hope the COCL will agree.	We have revised our report to indicate that Directive 215.00 has been approved by DOJ and that evaluations are done on an annual basis. Evaluations on an annual basis is the result of policy discussions between DOJ, PPB, City, and COCL.
Portland Copwatch	Pg. 100-101	This is the first mention that there was a survey done of PPB members. There is no Appendix cited. Up to this point we had no idea a new survey had been conducted. (Also see our comments on pp. 127-129.)	We have revised our report to include the complete survey results in an appendix.

Portland Copwatch	Pg. 100-101	Confusing phrasing: "the supervisors are reviewing the officer."	We have revised our report to address the confusing language.
Portland Copwatch	Pg. 106-108, 113-115	Paragraph 133 is listed as being in substantial compliance even though there were not cases that went to civil trial to indicate PPB's system is in place on this item to initiate administrative investigations of these incidents.	As the finding of liability in a civil trial is a relatively rare event, we feel it best to assess PPB on their system in place. Should a finding of liability occur and PPB not comply with their system, we will re-evaluate at that time.
Portland Copwatch	Pg. 106-108	Says that IPR conducted 30 of its own investigations in 2016, though the IPR annual report gives three different figures, all lower than 30 (22, 26 and 29). See < https://www.portlandoregon.gov/ipr/article/639598 >.	We have revised our report to indicate that IPR initiated 29 independent investigations.
Portland Copwatch	Pg. 109-111	There is no mention of the Citizen Review Committee (CRC) being removed from the 180 day timeline in the proposed amendments adopted by Council on August 24.	We have revised our report to include CRC appeals being removed from contributing to the 180 day timeline.
Portland Copwatch	Pg. 113-115	References the "second assessment report" even though the COCL's reports aren't labelled with such ordinal numbers.	The reference to "second assessment report" was in relation to a DOJ report (rather than COCL's report). However, we have revised our report to change this to "DOJ's 2016 Settlement Agreement Compliance Assessment".
Portland Copwatch	Pg. 113-115	As noted in our analysis, it is not clear in what way the Ordinance fails to instruct the Bureau to involve CRC in use of force Police Review Boards (PRBs); however, the ordinance still does not mention the right of the PRB to send cases back for more investigation.	As noted in our report, City Code 3.20.140 requires a CRC member to serve on the PRB in only a subset of force cases rather than all force cases (see 3.20.140 (C) (2) (a-d))
Portland Copwatch	Pg. 115-116	Mentions that "all but two" IPR complaints had proper paperwork in them, but not how many cases there were overall. (Two of ten is outrageous, two of 400 is less so.)	We noted in our report that for those two complaints, the complaint was filed by a third party on behalf of the community member and that because of this, there was no issue with the paperwork sent by IPR. In both of those, IPR attempted to contact the subject of the complaint, though no formal ICL was sent. Because contact was attempted and because an ICL was not sent only because the subject did not respond, we look at it as all cases substantially complying with the SA.
Portland Copwatch	Pg. 115-116	It may be true that IPR is sending letters to the complainants with the listed allegations, but it is not clear whether they are asking if those allegations reflect the complaint they made.	Complainants are provided an opportunity to correct allegations if IPR has incorrectly categorized them.
Portland Copwatch	Pg. 117-119	Finding substantial compliance that the complainant can only see his/her own documents and intake interview ignores why people are frustrated with the IPR system. In the same way the City examined the 48-hour rule and found ways to push the limits of the law, there should be more effort made to get more information to the complainant-- at minimum, police reports about them.	The ability of IPR to release information is guided by City Code 3.21.110 and we believe IPR provides information in accordance with that code. When requested, community members are referred to PPB for police reports as PPB is the keeper of those records.
Portland Copwatch	Pg. 120-123	Says that the City made no changes to the COCL/COAB structure in "Q1/Q2 2016," which pre-date the letters from COCL and COAB asking for "a divorce." So it's not clear why that timeline is given.	We have revised our report to address the confusing language.
Portland Copwatch	Pg. 127-129	PPB survey: It is not clear why the text and the Appendix (IX-2) only include data from five questions, when many more questions-- including about the efficacy of the DOJ Agreement-- were asked in the past.	We have revised our report to include the complete survey results in an appendix.

Portland Copwatch	Pg. 130-132	It is not clear why paragraph 166 access to documents was moved from partial to substantial compliance.	Prior designations of "Partial Compliance" were based on a short timeframe. After nearly 3 years of compliance assessments, we have received consistent access to documents and people. As such, we changed the compliance label to Substantial Compliance as there is now a long-enough timeframe to justify that label. If access to documents changes, we reserve the right to change this assessment back to partial compliance.
Portland Copwatch	Pg. 136	Personnel: It is not clear why there has been another turnover at the Behavioral Health Unit with Lt. Hager replaced by Chuck Lovell (who, we have ascertained, is also a Lieutenant). Also, especially given the removal of the head of Internal Affairs/Professional Standards in 2016, it would be good to list the current head in the list. PCW notes with extreme suspicion that Paul Meyer, who filed complaints against volunteer COAB members using Police Bureau letterhead, is now in charge of the Employee Information System.	We have revised our report to update the personnel appendix.
Portland Copwatch	Pg. 4	Text refers to "a reasonable good needs assessment system" instead of "reasonably good."	We have revised our report to address the confusing language.
Portland Copwatch	Pg. 29-30	Two references to the Taser "arching" when the term is "arcng." (It's an electrical arc, not a structural arch.)	We have revised our report to address the confusing language.
Portland Copwatch	Pg. 31, 88, 110	References say to (see page "x"); p. 110 compounds the confusion by referring to "Subsection A."	We have revised our report to identify the correct page numbers.
Portland Copwatch	Pg. 69	No close parenthesis on (79(h) +) .	We have revised our report to address this issue.
Portland Copwatch	Pg. 72-73	Refers to Crisis Intervention as Section VII but should say Section VI.	We have revised our report to address this issue.
Portland Copwatch	Pg. 74-75	Refers to Portland Fire and & Rescue [sic, there is an ampersand AND an "and"].	We have revised our report to address this issue.
Portland Copwatch	Pg. 90-91	Aging and Disability Resource Connection, which is abbreviated ADRC in its materials, is referred to as "Aging" in the report.	We have revised our report to include the full name.
BOEC	Pg. 94	Clarify the statement "after examining the data further, the results appear to indicate an ECIT officer arrives on scene in approximately 80% of cases." Currently phrased, it seems like they are only dispatched in 80% of cases.	We have revised our report to clarify this statement.
Lightning	Various Places in Training Section	Report mentions a lack of resources and staff within the training division, though does not address what would be sufficient.	Our report addresses the type of resources and staff we feel are important for the Training Division, including sufficient analysts, instructors, and other training personnel/resources. Sufficient should be interpreted as sufficient to accomplish the reasonable goals of the Training Division.
Dan Handelman	Pg. 44	Clarify how the force data portal will operate and whether PPB will continue to look at force trends.	We have revised our report to address these issues.
Dan Handelman	Absent from Report	Address the issue of protest force not being included in PPB's Quarterly Use of Force Summary Reports	We have revised our report to note that protest force is not included in the Quarterly Summary Force Reports. We have also added a recommendation that the open portal data include protest force events.

Michelle (Portland Copwatch)	Absent from Report	Portland signed the 21st Century Policing principles (focus on procedural justice) but it is unclear whether it is actually occurring. The principles should apply to all police-community relationships, not just interactions with persons with mental illness.	During Advanced Academy and in the most recent In-Service, PPB incorporated procedural justice elements into classroom and scenario portions. Although we note concerns with the classroom portion and the information provided, the scenario portions (and prior years scenario portions) were well delivered. We agree that the principles should apply to nearly all police-community interactions and will work with PPB to enhance the procedural justice portions of future in-service trainings. Additionally, we will continue to review police reports and Force Data Collection Reports (FDCR) for on-the-street applications of procedural justice elements.
Michelle (Portland Copwatch)	Training Section	PPB should be aware of the history of white supremacy in Portland and policing's history with it. PPB should own the history, train on it, and discuss how it has affected the community and the police.	While we agree that this should be a continuing discussion with PPB officers, we noted in our last report that officers went through a four-hour Equity training in the 2016 In-Service training. From our report: "...this class was a good opportunity for officers to hear the perspectives of community members, particularly those from people of color and those from lower socioeconomic categories...the training succeeded in its ability to introduce the perspective of some community members and provide historical background for the formulation of those perspectives."
Dan Handelman	Entire Report	When using acronyms within the report, identify the full name and include all acronyms in the appendix of the report.	Upon the first use of acronyms within the report, we strive to spell out the meaning and include it in the appendix. We have gone through this report to identify instances where this was overlooked.
Public Comment at Town Hall	Community Engagement Section	The cost of gathering information from PPB is too high and this constitutes a lack of transparency. PPB/City have justified the cost in personnel hours, but police reports are already compiled and are easy to release.	The cost of information requests is based on Portland City Code 5.48.030 rather than any internal PPB cost schedule. While we agree that high costs may act as a deterrent to requesting information, the City has set the price of gathering information based on the annual salary and benefits of the personnel performing the work.
Public Comment at Town Hall	Community Engagement Section	PPB members do not attend community meetings or are hiding during the meetings. This does not foster a positive police-community relationship.	In our report, we highlight the various community engagement activities performed by PPB. While we would always encourage more community engagement and the new leadership to revisit this issue, our assessment is that PPB has established many avenues where they actively engage the community.
Public Comment at Town Hall	Community Engagement Section	PPB officers should be rewarded for interacting with the community	PPB members will receive EIS entries for positive community engagement and community members are able to file commendations about an officer's positive conduct with both IPR and PPB. When and officer is reviewed by supervisors, EIS and commendations are considered.

Mr. Barnett	Entire Report	In prior reports, COCL indicated that data analysis was limited due to the use of RegJIN. Has this issue been resolved to the credit of PPB?	PPB continues to use RegJIN as a primary data source for many of the analyses performed by COCL and PPB. Although RegJIN continues to experience some limitations, PPB has used workarounds and other data collection methods to supplement their evaluation of various systems. For the moment, we believe the process used by PPB is acceptable, though continue to ask them to consider whether a new data system would assist in internal evaluations. As this would come at the expense of tax payers and cost millions of dollars, we stop short of making this a formal recommendation.
Dan Handelman	Behavioral Health Unit Advisory Committee	The Behavioral Health Unit Advisory Committee (BHUAC) continues to meet in private. Although minutes are posted online, private meetings do not allow community members to provide input.	As we have noted in past reports, the BHUAC has held two separate meetings on this issue and voted to keep meetings closed. This decision was based on the sensitivity of discussed information and the perception that closed meetings allow members to discuss matters more freely. We have recommended they consider an open meeting schedule (e.g. every third meeting being open to the public). However, there is no requirement in the Settlement Agreement for BHUAC to conduct open meetings.
Dr. Haynes	Training Section	PPB would benefit from training in cultural diversity. Training should include members of the community to provide first-hand experiences.	During the 2016 In-Service, PPB conducted an Equity training to discuss the historical relationship between police and the minority community. For that training, the trainer was not employed by PPB. PPB is also planning on an implicit bias training to occur in the 2018 In-Service. We agree that future training on such subjects should include regular community members to articulate cultural and neighborhood issues. We have added this as a recommendation to our report.
Kalei Luben	Training Section	The importance of de-escalation training should be emphasized to officers. Salt Lake City went 22 months without an officer involved shooting.	As noted in our report, the importance of de-escalation training is critical and the topic needs to be covered in a manner consistent with best practices. We will continue to work with PPB to stress its importance.
Kalei Luben	Community Engagement Section	The community is afraid of the police and the police are afraid of the community. The fear between the two entities should be reduced.	We agree with this statement in general and believe the procedural justice and de-escalation training will help accomplish that goal. Continued interaction in non-enforcement settings is helpful.
Public Comment at Town Hall	Community Engagement Section	The Settlement Agreement requires the collection of data regarding racial profiling and input from CPRC. However, CPRC has not met for two years.	The requirements of the COAB have largely been transferred to the proposed Portland Committee on Community Engaged Policing (PCCEP) structure. While we cannot comment on CPRC not meeting, we can say that upon PCCEP being operational, we will assess their adherence to the version of the Settlement Agreement which directs PCCEP.