

PCW	Although the report notes the injuries to officers, it does not note that there were hundreds of civilian injuries reported as a result of the PPB's use of force.	We do not have the data on community member injuries in the same way that we have data regarding officer injuries. However, we have updated our report to say that it is likely there was a corresponding number of community member injuries but those specific data were not available.
PCW (Multiple Comments)	The COCL found that the PPB is back in compliance with the entire Training section of the Settlement Agreement even though all the PPB has done is make a plan on how to train officers who were unable to attend training as a result of COVID	COCL was responsible for identifying the problem of missed training, and insisted on a remediation plan. We were not happy with the first plan and insisted on revisions. We eventually approved the training plan (and compliance) because the missing core skills training was an exact replication of what COCL had already observed in person in 2020. However, COCL will observe it again in 2021 to ensure the content and if we are not satisfied, PPB will lose its compliance rating for Section IV, Training.
PCW	The report is for Q4 2020 but a lot of the data discussed are from either Q2 or Q3	Our ability to report on the most up-to-date data has been impacted by the Settlement Agreement. Once the quarter ends, PPB has 45 days to provide us with supporting documents and data. Therefore, the supporting documents and data for the 4th quarter are not available until Feb. 15, meaning that for the <u>COCL's</u> 4th quarter report, the most up-to-date data is from the 3rd quarter. In 2021, we will work with PPB and DOJ to resolve this issue.
PCW	The COCL says they are not concerned with the force to custody ratio increasing to 4.6%. The COCL's own numbers show that custodies are down 25% but force is only down 16%, meaning there has not been a proportional drop in use of force.	While force has not decreased proportionate to custodies, such an analysis would need to take into account the types of interactions that have decreased. If petty contacts have decreased (ones that are less likely to contain force) but more serious contacts have not (ones that are more likely to contain force), then we would not expect to see a proportionate decrease. We have updated our report to clarify.
PCW	The report states that PPB's quarterly use of force reports do not include protest data but finds that quarterly reporting required by Par. 76 is in compliance.	We have updated our report to clarify that PPB's quarterly use of force reports do include protest data and non-protest data but that the two are separated out in the report.
PCW	The report notes that the COCL found "corrective action was taken" around use of force incidents even though it is extremely rare for officers to be found out of policy for a use of force incident.	As we note in our report, our review of the cases indicated that, where appropriate, formal and <u>non-formal</u> corrective action was taken. Non-formal action may be in the form of a debrief and does not necessarily indicate the officer was disciplined.
PCW	The report mentions that IPR can controvert a commander's findings and send misconduct cases to the PRB but not that the Assistance Chief's and Internal Affairs also have that power.	We have updated our report to include this information
PCW	The COCL does not indicate how the community at-large provided input on the Needs Assessment.	Our report indicates that the Training Division sought community input through a variety of avenues, including PCEP, the TAC, IPR, BHUAC, and community advisory boards, all including community representatives. We also note that PPB has reviewed relevant documents, including the community survey results and the Community Engagement Plan, both of which sought extensive input from the community at large.

PCW	The report calls for readers to find out which training will be done in person and which ones will be done online by looking at lists in the 2020 training plan, without giving a link and talks about the expanded topics being covered online, also without a link.	We have corrected this to refer to the draft training plan for 2021. It was drafted in December and has not been released.
PCW	The COCL should explain why the City Attorney has to do 35 sessions with only 24 officers to train all 850 PPB members via Zoom. It seems if you increase the class sizes, there can be fewer sessions.	Persons with experience using Zoom for education/training know that large class sizes are dysfunctional when the class requires frequent interaction between the instructor and the students. We have clarified this in the report.
PCW	The COCL is not concerned that ECIT officers are more likely to bring people to jail - 8.7% of the time vs. 5.3%.	Our report indicates that the finding is noteworthy but that a single evaluation is not a "cause for concern given that the four prior evaluations found no statistical differences." We further note that PPB will continue to monitor this situation and we would expect remedial actions should future evaluations continue to show differences.
PCW	Although the Bureau said they sent invitations about the Annual Report presentations to "local organizations within each Precinct," PCW has seen a copy of one of the invitations and there were only six people/groups listed. Community members were not provided sufficient advanced notification and Precinct meetings occurred between the Christmas and New Year's holidays. No public input was taken at the council hearing, undermining the concept of community engagement. Finally, only the Settlement Agreement and Policy Subcommittee reviewed the Annual Report, not the full PCCEP.	COCL is not satisfied with PPB's approach to presenting its Annual Report. Some of this information was not available to us when our draft report was prepared. We have since updated our Q4 report based on information collected from the community and PPB and consequently, we find that PPB is no longer in compliance for Par. 150 in Section IX on community engagement.
PCW	After the Bureau didn't analyze training in 2020, the report suggests putting out a two-year audit in 2022 covering two years. This would mean 2019 never gets audited and there will be a large gap between audits. The COCL should change this to putting out a two-year audit in 2021 which would cover 2019 and 2020 training.	COCL encouraged PPB to conduct an audit in 2022. We did not specify the timeframe as indicated in these comments. Training audits are not conducted every year. The Inspector General is currently conducting audits of other units and processes.
PCW	The number of alerts that led to interventions is the same in Q3 2019 and Q3 2020 even though there weren't ongoing protests nightly in 2019. Although the report indicates an uptick in alerts, it is consistent with the prior year.	This is accurate though we refer you to our 2020 Q1 report which notes that a backlog of commendations was put into EIS, thereby causing a spike in 2019 Q3 alerts.
PCW	One table on Pg. 37 shows referrals to SCT at a total of 172 though the other table shows the number to be 173	The second table on Pg. 37 relates to the decision to accept/decline a referral. The difference is most likely due to a referral near the end of the quarter but a decision not being made until after the beginning of the next quarter (e.g., referral on March 31 and decision made on April 1).

League of Women Voters	The report should provide more specific recommendations regarding PPB's annual report and the need to better engage with the community.	Our report does include a number of recommendations from PCCEP regarding the content of the Annual Report. Regarding community engagement, we have lowered our rating to Partial Compliance because the precinct presentations of the Annual Report were (1) not broadly announced to the public in advance; (2) did not occur in the East precinct, which includes BIPOC communities with strained police-community relations, and (3) did not provide evidence that the full range of topics required by Par. 150 were covered.
Community Member (Town Hall)	The report should note the importance of delivering de-escalation training for crowd control as an in-person training as opposed to virtually delivering the training.	Crowd control is taught in-person with the Rapid Response Team. For In-service training, we have recommended that PPB review "lessons learned" from the 2020 protests. In response to this comment, we have added the recommendation that PPB seek to incorporate de-escalation principles and techniques into crowd control training. We also bring to your attention that we have continued to stress de-escalation throughout our analysis of use of force.
PCCEP Member	The COCL should look at the report by 538 in assessing benchmarks. PPB has the 5th worst arrest disparity rate in the entire nation.	We have reviewed the 538 report, but since it appeared in 2021, it will not be cited here. In our Q4 report, we continue to examine disparities in stops and searches by race as they are generated by PPB analysts. We have referred the reader to PPB's 2019 stops report, which does provide an analysis of stop outcomes, including arrests. Looking at PPB arrests rates independent of stops is something that PCCEP, TAC, or other advisory groups might consider in the future.