

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

630.26, Public Safety Support Specialist Program

2nd Universal Review: 7/1/19 – 7/31/19 (clean)

Refer:

- ORS 181A.355 Definitions for ORS 181A.355 to 181A.670
- DIR 630.10, Driving Responses
- DIR 900.00, General Reporting Guidelines
- DIR 1010.00, Use of Force
- DIR 1500.00, Training
- Training Division Standard Operating Procedure ##, Public Safety Support Specialist Program

Definitions.

- **Active Aggression:** A threat or overt act of an assault (through physical or verbal means), coupled with the present ability to carry out the threat or assault, which reasonably indicates that an assault or injury to any person is about to happen, unless intervention occurs.
- **Public Safety Support Specialists:** Non-sworn members who are authorized to assist sworn members in the performance of certain duties that do not require law enforcement authority. Public Safety Support Specialists do not meet the statutory definition of “police officers” and are not Department of Public Safety Standards and Training (DPSST)-certified; therefore, they are not law enforcement officials (i.e., sworn members).
- **Public Safety Support Specialist Coach:** A sworn member or a non-probationary Public Safety Support Specialist who is assigned to a probationary Public Safety Support Specialist and responsible for both monitoring and documenting their performance, and providing resources to assist in their training and development.

Policy:

1. Portland Police Bureau’s (PPB) Public Safety Support Specialists (PS3s) provide support to the Bureau’s sworn members in non-emergency, non-priority situations; engage in community outreach with the public; offer a visible, community-based police support function to enhance PPB’s service to the public. PS3s are not intended to replace other job classifications, although they may supplement such work if needed.

Procedure:

1. Public Safety Support Specialists Training.
 - 1.1. PS3s shall receive initial training as determined by the Training Division. At a minimum, this training shall consist of the following:
 - 1.1.1. An introductory academy or comparable specialized training;
 - 1.1.2. Instruction with a mental health focus; and
 - 1.1.3. A field training program with a PS3 Coach.
 - 1.2. PS3s shall complete a one year probationary period from the date of hire.
 - 1.3. PS3s shall have an assigned PS3 coach during their probationary period.

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

- 1.4. PS3s shall receive ongoing training as determined by the Training Division.
2. Public Safety Support Specialists Duties and Responsibilities.
 - 2.1. PS3s shall act in accordance with all applicable Bureau Directives, Standard Operating Procedures (SOPs), and City of Portland Human Resources Administrative Rules (HRARs). They shall follow the lawful orders, commands, and instructions of sworn members.
 - 2.1.1. PS3s may utilize the Law Enforcement Data System (LEDS) and National Crime Information Center (NCIC) after completing appropriate training.
 - 2.2. PS3s shall be assigned to a precinct and work on an existing standard shift. They shall report to the shift sergeant(s) while on duty.
 - 2.3. Upon completion of the required probationary period and with the approval of their assigned shift sergeant, PS3s may have community members accompany them on a shift to observe their activities.
 - 2.4. Reporting.
 - 2.4.1. PS3s taking any authorized action while on duty shall write and submit an appropriate report to cover the incident, in accordance with Directive 900.00, General Reporting Guidelines.
 - 2.4.2. If a PS3 uses force while on duty, they shall immediately notify a supervisor and complete all force reporting requirements, in accordance with Directive 1010.00, Use of Force.
3. Prohibited Activity.
 - 3.1. Unless otherwise instructed by a supervisor, PS3s are not authorized to participate in or perform the following duties:
 - 3.1.1. Calls for service involving contact or potential contact with a criminal suspect(s);
 - 3.1.2. Any incident where it is likely there will be contact with a person in crisis (e.g., mental health, intoxication, drug-affected, etc.);
 - 3.1.3. Custodial transports (i.e., suspects, detox, Peace Officer Hold [POH]);
 - 3.1.4. Foot or vehicle pursuits;
 - 3.1.5. Emergency driving or any driving in violation of Oregon State traffic laws;
 - 3.1.6. Respond as cover for sworn members; or
 - 3.1.7. Any call where a sergeant determines it is outside the scope of employment or duties of a PS3.
 - 3.2. PS3s shall not work undercover assignments.
 - 3.3. PS3s shall not use physical force, unless unavoidably placed in a position where the force is in response to active aggression, and they must defend themselves or others.
 - 3.3.1. If a PS3 is involved in a force incident, this force will be subject to Directive 1010.00, Use of Force, and must include a complete After Action review by the precinct supervisor.

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

4. Uniforms and Equipment.
 - 4.1. PS3s shall wear uniforms with patches and/or logos that are distinct from Bureau sworn member uniforms and identify them as City of Portland employees.
 - 4.2. PS3s may attend trainings and certain events out of uniform, as appropriate (e.g., trainings with business casual dress requirements, other special events with permission from a sergeant).
 - 4.3. PS3s shall not wear or be issued PPB badges.
 - 4.4. PS3s shall carry defensive equipment (i.e., aerosol restraint) as determined by the Training Division.
 - 4.4.1. PS3s shall not be issued any of the following devices:
 - 4.4.1.1. Firearm;
 - 4.4.1.2. Conducted electrical weapon (CEW); or
 - 4.4.1.3. Any less lethal devices that operate on principles consistent with a firearm (e.g., less-lethal 40mm devices).
 - 4.4.2. PS3s are prohibited from carrying any firearms or less lethal devices described in 4.3.1. in the performance of the normal course of their duties.
 - 4.5. The Bureau shall assign specialized vehicles designed for PS3s' job functions. PS3s are only authorized to operate marked PPB vehicles to accomplish a specific task (e.g., move a vehicle between precincts, reposition vehicles at a crime scene).
5. Public Safety Support Specialist Coach Responsibilities.
 - 5.1. All PS3 coaches shall have a demonstrable record of professional conduct and suitable work performance.
 - 5.1.1. Members who have been subject to disciplinary action based upon the use of force or mistreatment of individuals with mental illness within the three preceding years, or twice in the preceding five years, shall be prohibited from serving as PS3 coaches.
 - 5.2. PS3 coaches shall monitor and evaluate the performance of their assigned PS3s during the designated probationary period.
6. Supervisor Responsibilities.
 - 6.1. The precinct shift sergeant shall supervise the day to day activities of any assigned PS3s.
 - 6.1.1. If the PS3 uses force (e.g., aerosol restraint deployment), the supervisor shall act in accordance with Directive 1010.00, Use of Force, when reviewing the incident.
7. Training Division.
 - 7.1. The Training Division shall administer the PS3 Program and maintain a program SOP.
 - 7.2. The Training Division Captain or a designee shall determine all PS3 Program-related training.

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

Provide feedback [here](#).

DRAFT

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

630.26, Public Safety Support Specialist Program

2nd Universal Review: 7/1/19 – 7/31/19 (markup)

Refer:

- ORS 181A.355 Definitions for ORS 181A.355 to 181A.670
- DIR 630.10, Driving Responses
- DIR 900.00, General Reporting Guidelines
- DIR 1010.00, Use of Force
- DIR 1500.00, Training
- Training Division Standard Operating Procedure ##, Public Safety Support Specialist Program

Definitions.

- **Active Aggression:** A threat or overt act of an assault (through physical or verbal means), coupled with the present ability to carry out the threat or assault, which reasonably indicates that an assault or injury to any person is about to happen, unless intervention occurs.
- **Public Safety Support Specialists:** Non-sworn members who are authorized to assist sworn members in the performance of certain duties that do not require law enforcement authority. Public Safety Support Specialists do not meet the statutory definition of “police officers” and are not Department of Public Safety Standards and Training (DPSST)-certified; therefore, they are not law enforcement officials (i.e., sworn members).
- **Public Safety Support Specialist Coach:** A sworn member or a non-probationary Public Safety Support Specialist who is assigned to a probationary Public Safety Support Specialist and responsible for both monitoring and documenting their performance, and providing resources to assist in their training and development.

Policy:

1. Portland Police Bureau’s (PPB) Public Safety Support Specialists (PS3s) provide support to the Bureau’s sworn members in non-emergency, non-priority situations; engage in community outreach with the public; offer a visible, community-based police support function to enhance PPB’s service to the public. PS3s are not intended to replace other job classifications. ~~They, although they~~ may supplement such work if needed; ~~however, the objective is for PS3s to work in an “observe and report” capacity.~~

Procedure:

1. Public Safety Support Specialists Training.
 - 1.1. PS3s shall receive initial training as determined by the Training Division. At a minimum, this training shall consist of the following:
 - 1.1.1. ~~Basic Police Academy~~ An introductory academy or comparable specialized training;
 - 1.1.2. Instruction with a mental health focus; and
 - 1.1.3. A field training program with a PS3 Coach.
 - 1.2. PS3s shall complete a one year probationary period from the date of hire.

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

- 1.3. PS3s shall have an assigned PS3 coach during their probationary period.
- 1.4. PS3s shall receive ongoing training as determined by the Training Division.
2. Public Safety Support Specialists Duties and Responsibilities.
 - 2.1. PS3s shall act in accordance with all applicable Bureau Directives, Standard Operating Procedures (SOPs), and City of Portland Human Resources Administrative Rules (HRARs). They shall follow the lawful orders, commands, and instructions of sworn members.
 - 2.1.1. PS3s may utilize the Law Enforcement Data System (LEDS) and National Crime Information Center (NCIC) after completing appropriate training.
 - 2.2. PS3s shall be assigned to a precinct and work on an existing standard shift. They shall report to the shift sergeant(s) while on duty.
 - 2.3. Upon completion of the required probationary period and with the approval of their assigned shift sergeant, PS3s may have community members accompany them on a shift to observe their activities.
 - 2.4. Reporting.
 - 2.4.1. PS3s taking any authorized action while on duty shall write and submit an appropriate report to cover the incident, in accordance with Directive 900.00, General Reporting Guidelines.
 - 2.4.2. If a PS3 uses force while on duty, they shall immediately notify a supervisor and complete all force reporting requirements, in accordance with Directive 1010.00, Use of Force.
3. Prohibited Activity.
 - 3.1. Unless otherwise instructed by a supervisor, PS3s are not authorized to participate in or perform the following duties:
 - 3.1.1. Calls for service involving contact or potential contact with a criminal suspect(s);
 - 3.1.2. Any incident where it is likely there will be contact with a person in crisis (e.g., mental health, intoxication, drug-affected, etc.);
 - 3.1.3. Custodial transports (i.e., suspects, detox, Peace Officer Hold [POH]);
 - 3.1.4. Foot or vehicle pursuits;
 - 3.1.5. Emergency driving or any driving in violation of Oregon State traffic laws;
 - 3.1.6. Respond as cover for sworn members; or
 - 3.1.7. Any call where a sergeant determines it is outside the scope of employment or duties of a PS3.
 - 3.2. PS3s shall not work undercover assignments.
 - ~~3.2.3.3.~~ PS3s shall not use physical force, unless unavoidably placed in a position where the force is in response to active aggression, and they must defend themselves or others.

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

~~3.2.1.3.3.1.~~ If a PS3 is involved in a force incident, this force will be subject to Directive 1010.00, Use of Force, and must include a complete After Action review by the precinct supervisor.

4. Uniforms and Equipment.

4.1. PS3s shall wear uniforms with patches and/or logos ~~identifying themselves that are distinct from Bureau sworn member uniforms and identify them~~ as City of Portland employees.

~~PS3s shall not work undercover assignments.~~

4.1.4.2. PS3s may attend trainings and certain events out of uniform, as appropriate (e.g., trainings with business casual dress requirements, other special events with permission from a sergeant).

4.2.4.3. PS3s shall not wear or be issued PPB badges.

4.3.4.4. PS3s shall carry defensive equipment (i.e., aerosol restraint) as determined by the Training Division.

4.3.1.4.4.1. PS3s shall not be issued any of the following devices:

4.3.1.1.4.4.1.1. Firearm;

4.3.1.2.4.4.1.2. Conducted electrical weapon (CEW); or

4.3.1.3.4.4.1.3. Any less lethal devices that operate on principles consistent with a firearm (e.g., less-lethal 40mm devices).

4.3.2.4.4.2. PS3s are prohibited from carrying any firearms or less lethal devices described in 4.3.1. in the performance of the normal course of their duties.

4.4.4.5. The Bureau shall assign specialized vehicles designed for PS3s' job functions.

PS3s are only authorized to operate marked PPB vehicles to accomplish a specific task (e.g., move a vehicle between precincts, reposition vehicles at a crime scene).

5. Public Safety Support Specialist Coach Responsibilities.

5.1. All PS3 coaches shall have a demonstrable record of professional conduct and suitable work performance.

5.1.1. Members who have been subject to disciplinary action based upon the use of force or mistreatment of individuals with mental illness within the three preceding years, or twice in the preceding five years, shall be prohibited from serving as PS3 coaches.

5.2. PS3 coaches shall monitor and evaluate the performance of their assigned PS3s during the designated probationary period.

6. Supervisor Responsibilities.

6.1. The precinct shift sergeant shall ~~supervisors~~supervise the day to day activities of any assigned PS3s.

6.1.1. If the PS3 uses force (e.g., aerosol restraint deployment), the supervisor shall act in accordance with Directive 1010.00, Use of Force, when reviewing the incident.

* Please note: This is a working draft of Directive 630.26. This is proposed language and the Bureau has not implemented any changes at this time. This is a new directive.

7. Training Division.

7.1. The Training Division shall administer the PS3 Program and maintain a program SOP.

7.2. The Training Division Captain or a designee shall determine all PS3 Program-related training.

DRAFT

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 15, 2019 12:30:25 PM
Last Modified: Wednesday, May 15, 2019 12:45:29 PM
Time Spent: 00:15:04
IP Address: 73.96.101.89

Page 1

Q1 Please provide feedback for this directive

Perhaps the training provided to Public Safety Support Specialists will include racial and sexual minority sensitivity training, training about implicit bias and being aware of these biases when dealing with members of oppressed communities, and training about trauma-based communication strategies. I know all of these topics are covered for sworn officers. It needs to be explicitly stated that non-sworn PS3s will receive the same training in these areas before being allowed to carry defensive weapons or interact with the public as a representative of PPB.

I can see this is a potential solution to the problem of sworn officer shortages in the city, and I applaud PPB for seeking creative ways to ensure public safety and positive interaction with the community. However, as a member of the sexual minority community, this makes me fearful that PS3s will not receive the necessary training to behave in a way that promotes trust between my community and PPB.

Making these trainings explicit in the policy directive, and making it clear that PS3s will be held to the same accountability if they are found to be discriminating against or providing unequal service to members of oppressed communities, shows that equal treatment is a priority to the Portland Police Bureau.

Thank-you for reading my feedback, and offering space for community members to participate in the process.

Q2 Contact Information (optional)

Name
Email Address
Phone Number

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 16, 2019 12:37:59 PM
Last Modified: Thursday, May 16, 2019 12:38:50 PM
Time Spent: 00:00:51
IP Address: 24.20.86.30

Page 1

Q1 Please provide feedback for this directive

Please provide a section that clearly outlines the types calls they respond to.

Q2 Contact Information (optional)

Respondent skipped this question

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, June 12, 2019 1:57:53 PM
Last Modified: Wednesday, June 12, 2019 1:58:39 PM
Time Spent: 00:00:46
IP Address: 97.120.135.203

Page 1

Q1 Please provide feedback for this directive

COMMENTS ON PUBLIC SAFETY SUPPORT SPECIALIST DIRECTIVE JUNE 2019

To Chief Outlaw, Capt. Parman, Lieutenant Morgan, PPB Policy Analysts, Compliance Officer/Community Liaison Team, Community Oversight Advisory Board staff, US Dept. of Justice, Independent Police Review, Citizen Review Committee and the Portland Police Bureau:

Below are Portland Copwatch's comments on the Public Safety Support Specialist (PSSS)* Directive (630.26) posted for review in June . While some of the limitations in this policy are a result of how the program was adopted at a City Council level, our comments are meant to address both that broader policy and the Bureau's proposed Directive.

We also note that this being a new Directive, we appreciate having 30 days to review it on the front end but continue to think that timeline should apply for all reviews. The Portland Committee on Community Engaged Policing (PCCEP) has still never weighed in on a single Directive, and one reason could be that they only meet once a month and can't meet the deadlines. We also think that since this is a new Directive, the Bureau could begin implementing our suggestion to add letters to section headings (Refer, Definitions, Policy, Procedure) so that there are not multiple sections with the same numbers, and to enumerate the Referrals and Definitions. Our comments below refer to the Procedure Section unless otherwise noted.

Broadly speaking, Portland Copwatch (PCW) continues to struggle with the concept of what were promised to the community as unarmed police officers, but are being deployed as glorified desk clerks with pepper spray.

The ongoing issues of the over-use of firearms in situations that may not require them (such pointing guns at drivers at traffic stops), the increase in use of deadly force, and the fact that armed officers are just plain intimidating to people who may have called for and/or are merely in need of help should all be pushing the PPB to look more like London bobbies below the rank of Sergeant... who don't carry firearms.

The issue of separating these new employees from other cops is prominent in the definition for PSSS's: it explicitly states they do not have Department of Public Safety Standards and Training certification and thus, are not law enforcement officials, "police officers" or even sworn PPB members. PSSS's are not issued badges (Section 4.2). This is going to cause confusion. It also begs the question of why the Portland Police Association (PPA) was allowed to absorb the Specialists into their (politically problematic) collective bargaining unit if they are not sworn personnel.

The narrowness of their job is further underscored in the Policy section, which limits them to "non-emergency, non-priority situations" (which could be more flexible), engaging in community outreach (that's ok), and "offer a visible, community-based police support function to enhance PPB's service to the public." It's not clear what that last part means, but it almost sounds as if there is more public relations than problem solving involved in the PSSS job. Likely at the behest of the PPA, the Policy also says PPPS's are "not intended to replace other job classifications," only to "supplement such work," but generally are limited to "observe and report."

Directive 630.26 Feedback

In terms of training, there are vague guidelines which say they have to go through Basic Police Academy "or comparable specialized training" (Section 1.1.1), and field training from a PSSS coach (1.1.3)-- who can be a sworn member (not necessarily a Field Training Officer) or another PSS Specialist. The coaches have the same limitation-- they can't have received discipline for use of force or mistreatment of people with mental illness-- as officers who want to be on the Enhanced Crisis Intervention Team or the Training Division (5.1.1). They also receive training with "a mental health focus" (1.1.2)-- which doesn't clarify if this means Crisis Intervention Training as required by the DOJ Agreement. This became a large issue for the Reserve Officers who all quit in recent months to join other law enforcement agencies due to not meeting DOJ standards. It's understandable to want to get people out on the streets quickly, but they should have as many skills as possible to engage with people in the community.

Interestingly, PSSS's will, with the proper training, have access to the criminal database systems, which seems odd if they are not law enforcement agents (Section 2.1.1). They also can have "ride-alongs" (or walk-alongs?) once they are done with their one year probationary period (2.3), are required to write reports about taking "authorized action" (2.4.1) and when they use force (2.4.2).

A PSSS is allowed to use force if "unavoidably placed in a position where the force is in response to active aggression, and they must defend themselves or others" (3.2.1). This Section should refer to the part of Directive 1010.00 that prohibits putting oneself into a position that precipitates the use of force (1010.00 Section 5.3.2).

They are not allowed to: respond to a call involving contact with criminal suspects (3.1.1) or people in crisis (3.1.2). They cannot transport people to jail, detox or a mental health facility (3.1.3), engage in pursuits (3.1.4), or violate any traffic laws (3.1.5). This last point raises an issue PCW has railed about for years: "No Special Rights for the Police." We frequently see officers going through red lights when not on an emergency call, making unlawful turns, driving while engaged in conversation on their radio or even looking at their onboard computers, all of which are activities they not only caution the public against, but can penalize them for doing. Perhaps more limitations should be put on how sworn officers are allowed to operate regular police cars. Public Safety Support Specialists are generally only allowed to operate special PSSS vehicles, while limited to driving "real" police cars when moving them from one place to another (4.4).

Other prohibitions are on responding as cover for sworn members (3.1.6), working undercover (4.1.1), and anything else a sergeant says they can't do (3.1.7). We hope there are people who are interested in doing this job given all these limitations, as over time more PSSS's should be hired, given more responsibility, and start making it unnecessary to worry about the unfilled positions for gun-toting sworn officers. The upside of the limitations is that PSSS's are not allowed to carry guns (4.3.11), Tasers (4.3.1.2), or less lethal weapons that work like firearms (4.3.1.3).

CONCLUSION

In summary, there are some parts of this Directive that should be clarified just to bring the PSSS's up to what the Bureau has designed for the position, but overall PCW would like to see these Specialists be fully trained and have the ability to act as law enforcement with a de-emphasis on using force to achieve their lawful goals.

As noted many times, PCW appreciates the opportunity to offer input on policies. A few more finalized policies were recently published which once again minimized concerns we raised in previous comments. On the other hand, the Bureau was kind to let us know that it's not necessary to provide feedback via the Directives website, and that comments emailed to PPBDirectives@PortlandOregon.gov are also accepted.

Thank you for your time

--Portland Copwatch

*- The Bureau's chosen acronym PS3 is the same as a Sony Playstation 3 and trivializes the work as a game.

Q2 Contact Information (optional)

Name

Email Address

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, June 14, 2019 4:04:07 PM
Last Modified: Friday, June 14, 2019 4:06:13 PM
Time Spent: 00:02:06
IP Address: 74.120.152.120

Page 1

Q1 Please provide feedback for this directive

4.1.1 is better placed under # 3 Prohibited Activity

6.1 wording should be "The precinct shift sergeant shall supervise the day to day activities of any assigned PS3s."

Q2 Contact Information (optional)

Name

Email Address

Phone Number
