



CITY OF PORTLAND, OREGON



Bureau of Police

Ted Wheeler, Mayor

Jami Resch, Chief of Police

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Integrity • Compassion • Accountability • Respect • Excellence • Service

Directives 900.00, General Reporting Guidelines, and 905.00, Non-Force After Action Reporting Executive Summary

Introduction

In accordance with the 2012 Department of Justice (DOJ) Settlement Agreement, the Portland Police Bureau is required to conduct an initial six-month and subsequent annual reviews of DOJ-identified directives after receiving DOJ approval on the directive and implementation. The Bureau originally enacted DOJ-approved Directives 900.00, General Reporting Guidelines, and 905.00, Non-Force After Action Reporting in August 2017 and initiated the six-month review of the directives in February 2018. Because the Bureau works closely with the DOJ and the Compliance Officer and Community Liaison (COCL) during the review of DOJ directives, scheduling conflicts often extend the review cycle and impact implementation.

During the period following the initial six months after implementation, the Bureau, along with the DOJ and COCL, monitored member action through the lens of the revised policies to ensure compliance with the DOJ Settlement Agreement and to assess any adverse operational impacts. Finding no deviations from the terms of the agreement or significant operational issues, the Bureau, with the approval of the DOJ, largely kept the policies intact. The Bureau made minor revisions to both directives to ensure consistency across related policies and added clarifying language to Directive 905.00, Non-Force After Action Reporting, to more clearly outline expectations and procedures for the After Action review of incidents that do not involve force.

Public Comments

The Bureau received minimal feedback during the universal review and public comment periods for each directive. In general, the comments centered on accountability – reporting procedures following an event or demonstration and Special Emergency Reaction Team (SERT) deployment, documentation requirements for member injuries, and the role of the Professional Standards Division (PSD) in this context.

After Action Reporting Requirements Following Events and Demonstrations and SERT Deployments

The Bureau received feedback in which a commenter expressed concern about the Bureau's revised After Action reporting requirements, specifically as they pertain to documenting the Bureau's management of events and demonstrations and SERT deployments. The commenter suggested that the new procedures are too limited and may allow for not documenting the Bureau's response in certain circumstances or its use of force.

The After Action completion and review processes are extensive and thorough by design, so as a result, they require a variety of resources (e.g., time, personnel) and, in some instances, executive level

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involvement. Both the Bureau and the DOJ recognized a need to streamline the After Action process for incidents that do not require a significant Bureau response, while maintaining sufficient review and accountability measures for those incidents that do. The commenter highlighted two specific circumstances in their feedback – incidents in which a member(s) uses force and SERT deployments. Pursuant to Directive 1010.00, Use of Force, members are required to report their use of force and supervisors are required to review those incidents through the After Action review process. Those standards apply to situations involving individual interactions (e.g., force used during a traffic stop) and in a crowd control context. The revisions in Directive 905.00, Non-Force After Action Reporting, do not invalidate or exclude the requirements set forth in the Bureau’s policy on using force. With regard to SERT deployments, the Bureau utilizes SERT in a variety of ways, depending on the circumstance. As described in Directive 720.00, Special Emergency Reaction Team and Crisis Negotiation Team Use, there are different activation tiers and within those tiers, varying levels of SERT involvement. The primary scenario envisioned in the revised Directive 905.00 that would not require an After Action, consists of utilizing SERT members in a subject matter expert capacity, absent full activation. Regardless of the activation tier or capacity in which the Bureau utilizes SERT during an incident, if force is used, an After Action is required. If a member(s) of SERT does not use force, but the incident or deployment satisfies the newly adopted reporting requirements established in the directive, then a supervisor must complete a non-force After Action.

Documenting Member Injuries,

The same commenter questioned the Bureau’s revised procedures for documenting member injuries.

For similar reasons noted above, the Bureau modified its procedure for documenting member injuries to account for existing resources and bandwidth, but preserved the more extensive review and documentation requirements for more severe member injuries. Although supervisors are no longer required to document minor injuries in an After Action, they must still record those injuries in the injury log, so there is still a mechanism for documenting and tracking injuries of a less severe nature.

The Role of the Professional Standards Division in the Context of the After Action Review Process

The commenter suggested that when supervisors have policy, training, tactical, or equipment concerns about a member’s actions, they should notify PSD, who should then consider whether to launch an investigation.

The After Action reporting and review process is one of several accountability tools the Bureau has in place to ensure members act in accordance with policy, training, and the law. Other mechanisms are administrative and criminal investigations, which PSD and the Detective Divisions oversee. During the After Action review process, a supervisor may determine that a member’s behavior (e.g., policy violation, misconduct, etc.) warrants a more thorough investigation. Nothing in Directive 905.00 precludes the supervisor from referring such cases to PSD. Directives 330.00, Internal Affairs, Complaint Intake and Processing, and 332.00, Administrative Investigations, set forth procedures for managing those incidents that may require investigation.

We thank every individual who took the time to provide feedback on these directives. All comments received during both review periods are attached at the end of this document. We have removed all personal information to protect the privacy of commenters.

The Bureau's Revised Policies

The Bureau worked in conjunction with the DOJ, COCL, and City Attorney's Office to review and revise both directives. These stakeholders made only minor revisions to the policies, as they did not identify any substantial operational issues or conflicts with the terms of the settlement agreement during the initial period of implementation. The changes to Directive 905.00, Non-Force After Action Reporting, allow for a more efficient use of Bureau resources, while retaining stringent accountability measures for Bureau responses and member action.

The Bureau believes that the revised directive provides more clarity and enhanced guidance to its members; however, any suggestions to further improve this policy are welcome during its next review.

These directives will become effective on May 15, 2020.

Published on April 15, 2020.

900.00, General Reporting Guidelines

Refer:

- DIR 905.00, Non-Force After Action Reports
- DIR 1010.00, Use of Force
- Request for Additional Information Form (Records)
- Detective Division Standard Operating Procedure (SOP) #3, Case Privatization
- ORS 192.000, Records; Public Reports and Meetings

Definitions:

- **Police Action:** Any circumstance, on or off duty, in which a sworn member exercises or attempts to exercise police authority.
- **Significant Incident:** An event about which other members on subsequent shifts should be informed (e.g., Class A and B felony crimes with suspect information and potentially violent or dangerous situations).

Policy:

1. This policy establishes the general reporting guidelines for all police action. For member reporting requirements pertaining to non-force after action reporting, members shall adhere to the guidelines set forth in Directive 905.00, Non-Force After Action Reports. For member reporting requirements pertaining to force after action reporting, members shall adhere to the guidelines set forth in Directive 1010.00, Use of Force.

Procedure:

1. Member Reporting.
 - 1.1. Field Note-taking.
 - 1.1.1. Members should record pertinent information regarding calls in a Bureau-issued duty notebook or in the vehicle computer.
 - 1.1.2. All handwritten notebook entries shall be maintained for five years.
 - 1.1.3. Members shall promptly forward copies of handwritten notebook entries requested by the Records division in response to public records requests made to the Bureau.
 - 1.2. Report Writing.
 - 1.2.1. Member Responsibilities.
 - 1.2.1.1. Members taking any official police action, on or off duty, shall write and submit an appropriate report to cover the incident, except in cases where the coded disposition sufficiently captures the resolution of the event.
 - 1.2.1.1.1. Members shall submit reports through the current Bureau-approved electronic platform.
 - 1.2.1.2. If on duty, the member shall write a report prior to going off shift, unless a holdover is approved or the member is incapacitated.
 - 1.2.1.3. If off duty, the member shall write a report as soon as practical after the event but no later than the end of their next scheduled shift.
 - 1.2.1.4. Member reports must accurately and objectively depict the facts of each incident, the results of the member's investigation and any member action

taken. Reports shall include all exculpatory information and also contain reference to the disposition of any property or evidence taken into custody, the results of records searches, witness statements and/or any other pertinent information.

- 1.2.1.5. Members shall write reports that clearly, completely, concisely and accurately portray the incident being reported. Common, everyday language should be used and jargon and acronyms should be avoided. Exact quotes should be used when taking direct statements. When investigating a crime, members shall document all elements of the criminal offense
 - 1.2.1.6. Members shall provide a complete chronological description of the details and results of the investigation.
 - 1.2.1.7. Required templates (e.g., Mental Health text template, Stops Data Collection Report) must be fully and accurately completed as soon as practicable. These templates are subject to review by Bureau supervisors.
- 1.2.2. Supervisor Responsibilities.
- 1.2.2.1. Supervisors shall not approve holdovers for the following reports:
 - 1.2.2.1.1. Custodies that will be arraigned the next court day
 - 1.2.2.1.2. Missing persons
 - 1.2.2.1.3. Stolen vehicles
 - 1.2.2.1.4. Recovered vehicles
 - 1.2.2.1.5. Death investigations
 - 1.2.2.1.6. Significant incident
 - 1.2.2.2. Supervisors shall ensure that member reports comply with Bureau requirements and include the necessary content.

1.3. Photographs

- 1.3.1. Members who photographically document crime scenes and injuries to victims/suspects shall do so in accordance with Directive 640.02, Photography and Digital Imaging.
- 1.3.2. Members who obtain photographs during their investigations shall document that fact and shall submit the photographs in accordance with Directive 660.10, Property and Evidence Procedure.

1.4. Case Management.

- 1.4.1. Members shall conduct appropriate case follow up.
- 1.4.2. Members shall ensure cases are closed or suspended when appropriate.

2. Report Review.

- 2.1. If the supervisor determines that a report is insufficient, the supervisor shall, if feasible, ensure that the member corrects the report before the end of shift. If the member is not able to complete the correction prior to the end of shift, the member shall complete the report as soon as possible upon their return to duty.
 - 2.1.1. When a member submits a deficient report, the supervisor shall discuss the error(s) with the member as soon as practicable.

2.2. The Records Division (Records) or an investigative unit/detail may initiate a request for additional information via email by submitting a request form to the Responsibility Unit (RU) Manager.

2.2.1. Members shall submit the completed supplemental form as soon as practicable.

2.3. Privatization of Reports.

2.3.1. When feasible, members should privatize only cases where the release of critical or sensitive information could jeopardize the investigation or the safety of an individual. Members should refer to the Detective Division SOP #3, Case Privatization for additional guidance.

2.3.2. Members must balance the decision to privatize cases and critical information against maintaining transparency within the Bureau case management system.

2.3.3. Members shall un-privatize cases as soon as practicable to facilitate internal case review and management.

2.3.4. Copies of privatized reports shall be released only for law enforcement purposes upon authorization of the investigator assigned to the case or of a supervisory sergeant in the investigative unit concerned. The assigned investigator must give Records access to the report. The investigator shall authorize involved units or specific personnel to access their assigned privatized reports.

2.3.5. Members should be aware that the choice to privatize a document will not necessarily deem it confidential for purposes of public records requests and disclosure under Oregon law.

3. Public Records

3.1. During the course of an open investigation, police authored documents, whether privatized or not, may be privileged and need not be disclosed. After an investigation is completed, all documents, including those previously privatized, are presumed to be open to disclosure unless a legal exemption applies. Exemption applicability will be decided with the assistance of the City Attorney's Office.

3.2. Any person seeking access to a police-authored document at any time (except for law enforcement or prosecution partners) must file a request for same through the City of Portland web portal, and members are instructed to advise any person who requests police documents that they must submit a public records request through that channel.

History:

- Originating Directive Effective: 07/21/17
- Last Revision Signed: 04/15/20
 - Effective Date: 05/15/20
- Next Review Date: 05/15/21

900.00, General Reporting Guidelines

Refer:

- DIR 905.00, Non-Force After Action Reports
- DIR 1010.00, Use of Force
- Request for Additional Information Form (Records)
- Detective Division Standard Operating Procedure (SOP) #3, Case Privatization
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Definitions:

- Police Action: Any circumstance, on or off duty, in which a sworn member exercises or attempts to exercise police authority.
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#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, March 28, 2018 2:41:34 PM
Last Modified: Wednesday, March 28, 2018 2:42:29 PM
Time Spent: 00:00:55

Page 1

Q1 Please provide feedback for this directive

Directive 900.00 Feedback

COMMENTS ON FORCE, REPORTING, WEAPONS AND VEHICLE RELATED DIRECTIVES, MARCH 2018

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

Below are our comments on the Directives posted for review on March 1 . We discovered them on the PPB website on March 9 and asked the Bureau whether a formal email had gone out to the community asking for input. The information was finally sent out on March 23. While the Bureau has signalled its intention (in Directive 010.00) to change the review timelines so there are 15 days for first reviews and 30 days for second reviews, PCW continues to think there should be longer timelines, especially for complex policies such as Use of Force (1010.00).

Of the seven policies up for review, we previously commented on five in July 2017, one (630.60-Vehicle Disposition) in October 2014, and one (630.05-Vehicle Interventions and Pursuits) in August 2015. With the exception of 630.05, most of these comments are repeats of ones we made previously that the Bureau has chosen to reject or ignore. As noted last year, our primary concern with 1010.00 is that it defines de-escalation both as lowering tension at a scene and using less force on a suspect. We also noted that the key promise made by the presence of the US Department of Justice around deadly force incidents-- that they should not be treated differently from other uses of force-- seems to have gone out the window. This was codified by the changes made to 1010.10 through City Council, wherein offices involved in the death of a civilian are not being required to write force reports until after a criminal investigation has ended, and if their gunfire did not result in death the Bureau is leaving such reporting up to the discretion of supervisors. As we noted last year, this is no way to build trust in the community or hold officers accountable.

We point you once again to comments we made on 1010.00 Force (and 1051.00 Taser Use) in October, 2012: .

We continue to urge the Bureau to number all of the sections of the Directives, such as the Definitions, Policy and Procedure sections (our comments here refer to the Procedure section unless otherwise noted). Interestingly, 630.60 includes just such a numbering scheme even though there are no definitions in Section 2; this shows that the Bureau was numbering the Definitions in 2014 but stopped without explanation.

DIRECTIVE 900.00 GENERAL REPORTING GUIDELINES

Among the items we noticed in 2017:

--Section 1.2.1.3, requiring reporting of an off-duty incident, calls for that report to be written "as soon as practical," where the old policy required it to be written within four hours of occurrence.

--It's quite confusing that in Section 2.3 "Privatization of Reports" and Section 3 on Public Records, the term "privatized" is used to mean "make confidential." Privatization refers to taking public institutions and put them in the hands of private corporations. We continue to urge the Bureau to find a better word for the practice.

CONCLUSION

As we have stated before, Portland Copwatch appreciates the Bureau reaching out to the community for comment, but are looking forward to more of an open dialogue when the Portland Committee on Community Engaged Policing gets underway (if ever). We continue to urge the Bureau to be open to revising its timelines for review to ensure meaningful public input can take place. One of the only reasons we were able to tackle these rather long Directives is that we had made comments on them earlier. Our commentary would be much shorter if we could just be thanking the Bureau for adopting our advice, but such changes are few and far between.

Portland Copwatch

Q2 Contact Information (optional)

Name

Portland Copwatch

Email Address

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, November 30, 2018 10:28:26 PM
Last Modified: Friday, November 30, 2018 10:33:41 PM
Time Spent: 00:05:15
IP Address: 74.120.152.118

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Q1 Please provide feedback for this directive

2.2 Records members have been opting to send the first Request for Additional Information via email. We have found that this is the quickest method of obtaining what we need. This is also considered a first request with subsequent requests submitted on the form.

Q2 Contact Information (optional)

Name

Email Address

Phone Number

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 28, 2018 7:00:37 PM
Last Modified: Friday, December 28, 2018 7:01:25 PM
Time Spent: 00:00:48
IP Address: 97.120.240.6

Page 1

Q1 Please provide feedback for this directive

COMMENTS ON FORCE, REPORTING, WEAPONS AND VEHICLE INTERVENTION DIRECTIVES, DECEMBER 2018

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

Below are our comments on the Directives posted for review on December 1 and December 14 . As we noted in an email to the PPB, the comment the Bureau attached to Directive 1010.10 on Deadly Force investigations states that the Bureau received no feedback on that policy in March, but 1010.10 was not posted for review in March. (The Bureau replied that the Directive was actually posted in April, but no public notification went out.)

All the other Directives posted on December 1 are ones we did comment on at that time, whereas the "odd Directive out" number 313.70 on Associations was previously posted in draft form for comment in June 2016, but apparently was never changed.

We continue to be concerned that Directive 1010.00 on Use of Force defines de-escalation both as lowering tension at a scene and using less force on a suspect. We repeat here our opposition to changes made in 2017 to these policies: they delay the requirement for officers involved in the death of a civilian to write force reports until after a criminal investigation has ended, and if their gunfire did not result in death, they leave such reporting up to the discretion of supervisors.

Going through the revised Force policy, we note that very few suggestions from Portland Copwatch were incorporated, while many suggestions from the ACLU were adopted in one way or another. It is really too bad that the Bureau discusses these changes behind closed doors as a public meeting with various stakeholders could lead to better policy making which doesn't require repeated fixing. We point the Bureau to the COCL's reports where they respond to various recommendations one by one explaining whether and why they include various suggestions into their final reports. While there is a place for the anonymous listings in the Bureau's publication of incoming comments, groups which wish to be identified (including ACLU and Portland Copwatch), and City-run advisory bodies (such as the Training Advisory Council, Citizen Review Committee, Community Oversight Advisory Board and, if they ever start looking at policies, the Portland Committee on Community Engaged Policing/PCCEP) should know what became of their suggestions.

An overall note we included as a footnote last time, but which requires serious attention: The Bureau should stop using the word "tool" to refer to weapons, as is done repeatedly in Directive 1010.00, and in Directive 1020.00 (proposed Section 5.4.3). These items are all designed to kill, harm, wound, or physically coerce people to follow police orders, not items used to hang kitchen doors or repair automobiles.

PCW acknowledges that the PPB is changing all language about previous shotgun-loaded "less lethal" munitions to reflect the new 40 MM launcher system in Directives 1010.00 and 1020.00.

We continue to urge the Bureau to give different labels to all of the sections of the Directives, such as the Definitions, Policy and Procedure sections (our comments here refer to the Procedure section unless otherwise noted) so there are not multiple sections

Directive 900.00 Feedback

numbered "1." There is currently only one section in 313.70 but as the Bureau adds its new numbering scheme, if other sections are added we hope these changes will be considered.

DIRECTIVE 900.00 GENERAL REPORTING GUIDELINES

--Section 1.2.1.3, which used to require reports on off-duty incidents to be written within four hours and then "as soon as practical," is being changed to reflect the noted addition in 1010.10 (11.1.4.1), requiring the report by the end of the officer's next shift.

--PCW continues to encourage the Bureau to use a different word than "Privatization" in Sections 2.3 and 3 to mean "make confidential." Members of the public think of privatization as putting public institutions in the hands of private corporations.

--PCW acknowledges that the Bureau has changed the term "masks" to "templates" to reflect the way data input screens are now labeled.

CONCLUSION

Portland Copwatch would still like to see more of an open dialogue around the Directives, perhaps under the auspices of the PCCEP. We also note that while these comments are easier for PCW to make since we've looked at all of these Directives in previous forms, the timelines are still restrictive for many people, including groups who only meet once a month.

-

Portland Copwatch

Q2 Contact Information (optional)

Name

Portland Copwatch

Email Address

905.00, Non-Force After Action Reporting

Refer:

- DIR 315.30, Satisfactory Performance
- DIR 330.00, Internal Affairs, Compliant Intake, and Processing
- DIR 333.00, Criminal Investigations of Police Bureau Employees
- DIR 345.00, Employee Information System
- DIR 630.05, Vehicle Interventions and Pursuits
- DIR 635.10, Crowd Management/Crowd Control
- DIR 720.00, Special Emergency Reaction Team (SERT) and Crisis Negotiation Team (CNT) Use
- DIR 740.00, Explosive Device Incidents and EDU
- DIR 1010.00, Use of Force
- After Action Form
- Operation Order Form

Definitions:

- **Administrative Review:** A written determination that requires the gathering and evaluating of information to develop a course of action.
- **After Action Report:** A written report that describes a police action and assesses its adherence to policy through critique and evaluation using required criteria.

Policy:

1. The Bureau is committed to promoting and preserving systems of transparency and accountability. When member action warrants administrative review, the Bureau is dedicated to reporting and investigating the event to determine if the member's action was in accordance with Bureau training and policy. This policy establishes the general reporting guidelines for all non-force events or incidents.

Procedure:

1. Non-Force After Action Reporting Requirements.

- 1.1. Supervisors shall be required to complete an After Action Report for the following events:
 - 1.1.1. Member injury resulting in hospital admission or death. For all other member injuries, supervisors shall be required to enter critiques and recommendations in the appropriate section of the injury log entry.
 - 1.1.2. Injury to a suspect in custody, not sustained through member use of force.
 - 1.1.3. Police vehicle collision.
 - 1.1.4. Any incident or event for which an Incident Action Plan was written.
 - 1.1.5. Damage to or loss of city property.
 - 1.1.6. Any other non-force incident or event, as directed.
 - 1.1.7. Vehicle Pursuit without force implications. Supervisors shall refer to Directive 630.05, Vehicle Intervention and Pursuits, for additional guidance. Supervisors shall follow the procedures set forth in Directive 630.05, Vehicle Interventions and Pursuits and Directive 1010.00, Use of Force, for all pursuit-related after action reporting requirements.

- 1.1.8. Special Emergency Reaction Team (SERT), Crisis Negotiation Team (CNT), or Rapid Response Team (RRT) deployments that are managed by a Critical Incident Commander (CIC) or a Crowd Management Incident Commander (CMIC). Supervisors shall refer to Directive 720.00, SERT and CNT Use, or Directive 635.10, Crowd Management/Crowd Control for additional guidance. If force is used, the force After Action shall be incorporated as required by Directive 1010.00, Use of Force.
- 1.1.9. Explosives Disposal Unit (EDU) deployments where an energetic tool is used. Supervisors shall refer to Directive 740.00, Explosive Device Incidents and EDU, for additional guidance.
- 1.2. Supervisors shall follow the procedures set forth in Directive 1010.00, Use of Force, for all force-related after action reporting requirements.
- 1.3. After Action reports must meet the requirements of Directive 345.00, Employee Information System (EIS).
- 1.4. The chain of review for Non-Force After Action Reports will end at the RU Manager, except for those instances outlined below.
 - 1.4.1. After Action Reports for injuries to a member or suspect in custody, that result in hospital admission or death will be reviewed and approved by the appropriate Assistant Chief.
 - 1.4.2. After Action Reports for Police Vehicle Collisions that require an Oregon Traffic Crash Report, or that result in an injury to any person, will be reviewed and approved by the appropriate Assistant Chief.
 - 1.4.3. After Action Reports for incident or events for which an Incident Action Plan was written, that require resources or funding (other than cost recovery or secondary employment) outside of the originating RU will be reviewed and approved by the appropriate Assistant Chief.
 - 1.4.4. After Action Reports for all Vehicle Pursuits will be reviewed and approved by the appropriate Assistant Chief.
 - 1.4.5. After Action Reports following SERT, CNT, or RRT deployments that are managed by a Critical Incident Commander or a Crowd Management Incident Commander will be reviewed and approved by the appropriate Assistant Chief.
2. Non-Force After Action Report Format and Deadlines.
 - 2.1. Supervisors shall complete the non-force After Action form posted on the Portland Police Bureau (PPB) Intranet under the “after action” link. The overseeing Assistant Chief (AC) will forward copies to the Training Division and Internal Affairs, when there are training deficiencies or claims of misconduct implicated in the report and that cannot be resolved in the after action. The format shall not be changed or altered without permission of the Chief of Police. The report format shall include:
 - 2.1.1. Summary: The summary will be a short one or two paragraph narrative that describes the significant facts of the event.
 - 2.1.2. Personnel Costs (if applicable): These costs will be calculated using the following formula: The number of individuals participating per rank (use the highest rank)

or category multiplied by the hourly wage for that rank or category multiplied by the total hours.

- 2.1.3. Critique Findings and Recommendations: The critique findings and recommendations will contain a thorough analysis of the incident. It will address any applicable directives, whether or not members complied with such directives, and any recommendations made or actions taken to address issues.
- 2.1.4. Supporting Documentation: The After Action Report shall include supplemental information related to the incident.
- 2.2. The Sergeant shall complete an After Action Report within seven days of the event. Exceptions to this requirement must be approved by the Responsibility Unit (RU) Manager of the precinct, division or unit where the supervisor is assigned. This approval must be documented in the After Action Report.
- 2.3. The RU Manager, Critical Incident Commander (CIC), or Crowd Management Incident Commander (CMIC) shall complete a review and submit recommendations, when required under section 1.4, to the appropriate Assistant Chief within 21 days from the date of the event. Exceptions to this requirement must be approved by the appropriate Assistant Chief and the approval must be documented in the After Action Report.
- 2.4. The appropriate Assistant Chief or designee shall complete a review of the After Action Reports, listed under section 1.4., within 28 days from the event.
- 2.5. Upon approval by the RU Manager, or appropriate Assistant Chief, all After Action Reports shall be uploaded to and stored in the appropriate recordkeeping system.
3. **Non-Force After Action Reporting Accountability.**
 - 3.1. All supervisors in the chain of command shall be held accountable for inadequate reports and analysis. As a result, all supervisors shall be subject to corrective action or discipline for the accuracy and completeness of After Action Reports completed by other supervisors under their command. Corrective or disciplinary action may include training, demotion, and/or removal from a supervisory position, based on repeated deficient report reviews at any level of command.
 - 3.2. Where member action indicates policy, training, tactical or equipment concerns, the immediate supervisor shall document those concerns in the After Action Report. The RU Manager or appropriate Assistant Chief shall ensure that concerns are addressed in a timely manner.
 - 3.3. When, after investigation, member action is found to violate policy, the Bureau shall ensure that member misconduct is adequately addressed and, when appropriate, investigative findings and corrective action are taken fairly and expeditiously to resolve the issue.

- 3.4. The appropriate Assistant Chief, or designee, has the discretion to reassign an investigation to the Detective Division or any Bureau supervisor, thereby taking it out of the after action chain of command as described.
- 3.5. The Chief may delegate the authority to review, audit and authenticate After Action Report entries and ensure consistency across the Bureau.

History:

- Originating Directive Effective: 07/21/17
- Last Revision Signed: 04/15/20
 - Effective Date: 05/15/20
- Next Review Date: 05/15/21

905.00, Non-Force After Action Reporting

Refer:

- DIR 315.30, Satisfactory Performance
- DIR 330.00, Internal Affairs, Compliant Intake, and Processing
- DIR 333.00, Criminal Investigations of Police Bureau Employees
- DIR 345.00, Employee Information System
- DIR 630.05, Vehicle Interventions and Pursuits
- DIR 635.10, Crowd Management/Crowd Control
- DIR 720.00, Special Emergency Reaction Team (SERT) and Crisis Negotiation Team (CNT) Use
- DIR 740.00, Explosive Device Incidents and EDU
- DIR 1010.00, Use of Force
- After Action Form
- Operation Order Form

Definitions:

- Administrative Review:- A written determination that requires the gathering and evaluating of information to develop a course of action.
- After Action Report: -A written report that describes a police action and assesses its adherence to policy through critique and evaluation using required criteria.

Policy:

1. The Bureau is committed to promoting and preserving systems of transparency and accountability. When member action warrants administrative review, the Bureau is dedicated to reporting and investigating the event to determine if the member's action was in accordance with Bureau training and policy. This policy establishes the general reporting guidelines for all non-force events or incidents.

Procedure:

1. Non-Force After Action Reporting Requirements.

- 1.1. Supervisors shall be required to complete an After Action Report for the following events:

~~1.1.1. Member injury requiring treatment at a medical facility or requiring the member to end a shift prematurely.~~

1.1.1. Member injury resulting in hospital admission or death. For all other member injuries, supervisors shall be required to enter critiques and recommendations in the appropriate section of the injury log entry.

~~1.1.1.1.2.~~ Injury to a suspect in custody, not sustained through member use of force.

~~1.1.2.1.1.3.~~ Police vehicle collision.

~~1.1.3.1.1.4.~~ Any incident or event for which an Incident Action Plan was written.

~~1.1.4.1.1.5.~~ Damage to or loss of city property.

~~1.1.5.1.1.6.~~ Any other non-force incident or event, as directed.

- 1.2. ~~Supervisors shall follow the procedures set forth in Directive 1010.00, Use of Force, for all force-related after action reporting requirements.~~

~~1.1.6.1.1.7.~~ Supervisors shall complete a non-force After Action Report following a vehicle pursuit without force implications. Supervisors shall refer to Directive 630.05, Vehicle Intervention and Pursuits, for additional guidance. ~~Supervisors shall follow the procedures set forth in Directive 630.05, Vehicle Interventions and Pursuits and Directive 1010.00, Use of Force, for all pursuit-related after action reporting requirements.~~

~~1.3. Supervisors shall complete an After Action Report following a significant civil disturbance requiring an organized police response. Supervisors shall refer to Directive 635.10, Crowd Management/Crowd Control, for additional guidance. If force is used, the force After Action shall be incorporated as required by Directive 1010.00, Use of Force.~~

~~1.1.7.1.1.8.~~ Supervisors shall complete an After Action Report following Special Emergency Reaction Team (SERT) and Crisis Negotiation Team (CNT) deployment for non-force events, or Rapid Response Team (RRT) deployments that are managed by a Critical Incident Commander (CIC) or a Crowd Management Incident Commander (CMIC). Supervisors shall refer to Directive 720.00, SERT and ~~HNTCNT~~ Use, or Directive 635.10, Crowd Management/Crowd Control for additional guidance. ~~If force is used, the force After Action shall be incorporated as required by Directive 1010.00, Use of Force.~~

~~1.1.8.1.1.9.~~ Supervisors shall complete an After Action Report following Explosives Disposal Unit (EDU) deployment, deployments where an energetic tool is used. Supervisors shall refer to Directive 740.00, Explosive Device Incidents and EDU, for additional guidance.

~~1.2. Supervisors shall follow the procedures set forth in Directive 660.10, Property and Evidence Procedures~~ 1010.00, Use of Force, for all force-related after action reporting requirements pertaining to firearm and narcotics destruction.

~~1.2.1.3.~~ After Action reports must meet the requirements of Directive 345.00, Employee Information System (EIS).

1.4. The chain of review for Non-Force After Action Reports will end at the RU Manager, except for those instances outlined below.

1.4.1. After Action Reports for injuries to a member or suspect in custody, that result in hospital admission or death will be reviewed and approved by the appropriate Assistant Chief.

1.4.2. After Action Reports for Police Vehicle Collisions that require an Oregon Traffic Crash Report, or that result in an injury to any person, will be reviewed and approved by the appropriate Assistant Chief.

1.4.3. After Action Reports for incident or events for which an Incident Action Plan was written, that require resources or funding (other than cost recovery or secondary

employment) outside of the originating RU will be reviewed and approved by the appropriate Assistant Chief.

1.4.4. After Action Reports for all Vehicle Pursuits will be reviewed and approved by the appropriate Assistant Chief.

1.4.5. After Action Reports following ~~Special Emergency Reaction Team (SERT), Crisis Negotiation Team (CNT), or Rapid Response Team (RRT)~~ deployments that are managed by a Critical Incident Commander or a Crowd Management Incident Commander will be reviewed and approved by the appropriate Assistant Chief.

2. Non-Force After Action Report Format and Deadlines.

2.1. Supervisors shall complete the non-force After Action form posted on the Portland Police Bureau (PPB) Intranet under the “after action” link. ~~_-~~ The overseeing Assistant Chief (AC) will forward copies to the Training Division and Internal Affairs, when there are training deficiencies or claims of misconduct implicated in the report and that cannot be resolved in the after action. ~~_-~~ The format shall not be changed or altered without permission of the Chief of Police. ~~_-~~ The report format shall include:

2.1.1. Summary: ~~_-~~ The summary will be a short one or two paragraph narrative that describes the significant facts of the event.

2.1.2. Personnel Costs (if applicable): ~~_-~~ These costs will be calculated using the following formula: ~~_-~~ The number of individuals participating per rank (use the highest rank) or category multiplied by the hourly wage for that rank or category multiplied by the total hours.

2.1.3. Critique Findings and Recommendations: ~~_-~~ The critique findings and recommendations will contain a thorough analysis of the incident. ~~_-~~ It will address any applicable directives, whether or not members complied with such directives, and any recommendations made or actions taken to address issues.

2.1.4. Supporting Documentation: ~~_-~~ The After Action Report shall include supplemental information related to the incident. ~~_-~~

2.2. The Sergeant shall complete an After Action Report within seven days of the event. ~~_-~~ Exceptions to this requirement ~~will be rare and~~ must be approved by the Responsibility Unit (RU) Manager of the precinct, division or unit where the supervisor is assigned. ~~_-~~ This approval must be documented in the After Action Report. ~~_-~~

2.3. The RU Manager, Critical Incident Commander (CIC), or Crowd Management Incident Commander (CMIC) shall complete a review and submit recommendations, when required under section 1.4, to the appropriate Assistant Chief within ~~twenty-one~~21 days from the date of the event. ~~_-~~ Exceptions to this requirement must be approved by the appropriate Assistant Chief and the approval must be documented in the After Action Report. ~~_-~~

2.4. The appropriate Assistant Chief; or designee; shall complete a review of the After Action ~~Report~~Reports, listed under section 1.4., within ~~twenty-eight~~28 days from the event.

2.5. Upon approval by the RU Manager, or appropriate Assistant Chief, all After Action Reports shall be uploaded to and stored in the appropriate recordkeeping system. ~~_-~~

3. **Non-Force After Action Reporting Accountability.**

- 3.1. All supervisors in the chain of command shall be held accountable for inadequate reports and analysis. As a result, all supervisors shall be subject to corrective action or discipline for the accuracy and completeness of After Action Reports completed by other supervisors under their command. Corrective or disciplinary action may include training, demotion, and/or removal from a supervisory position, based on repeated deficient report reviews at any level of command.
- 3.2. Where member action indicates policy, training, tactical or equipment concerns, the immediate supervisor shall ~~notify, through channels, document those concerns in the branch~~ After Action Report. The RU Manager or appropriate Assistant Chief, ~~who~~ shall ensure that concerns are addressed in a timely manner.
- 3.3. When, after investigation, member action is found to violate policy, the Bureau shall ensure that member misconduct is adequately addressed and, when appropriate, investigative findings and corrective action are taken fairly and expeditiously to resolve the issue.
- 3.4. The appropriate Assistant Chief, or designee, has the discretion to reassign an investigation to the Detective Division or any Bureau supervisor, thereby taking it out of the after action chain of command as described.
- 3.5. The Chief may delegate the authority to review, audit and authenticate After Action Report entries and ensure consistency across the Bureau.

#1

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Last Modified: Wednesday, March 28, 2018 2:41:24 PM
Time Spent: 00:00:59

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Q1 Please provide feedback for this directive

COMMENTS ON FORCE, REPORTING, WEAPONS AND VEHICLE RELATED DIRECTIVES, MARCH 2018

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

Below are our comments on the Directives posted for review on March 1 . We discovered them on the PPB website on March 9 and asked the Bureau whether a formal email had gone out to the community asking for input. The information was finally sent out on March 23. While the Bureau has signalled its intention (in Directive 010.00) to change the review timelines so there are 15 days for first reviews and 30 days for second reviews, PCW continues to think there should be longer timelines, especially for complex policies such as Use of Force (1010.00).

Of the seven policies up for review, we previously commented on five in July 2017, one (630.60-Vehicle Disposition) in October 2014, and one (630.05-Vehicle Interventions and Pursuits) in August 2015. With the exception of 630.05, most of these comments are repeats of ones we made previously that the Bureau has chosen to reject or ignore. As noted last year, our primary concern with 1010.00 is that it defines de-escalation both as lowering tension at a scene and using less force on a suspect. We also noted that the key promise made by the presence of the US Department of Justice around deadly force incidents-- that they should not be treated differently from other uses of force-- seems to have gone out the window. This was codified by the changes made to 1010.10 through City Council, wherein offices involved in the death of a civilian are not being required to write force reports until after a criminal investigation has ended, and if their gunfire did not result in death the Bureau is leaving such reporting up to the discretion of supervisors. As we noted last year, this is no way to build trust in the community or hold officers accountable.

We point you once again to comments we made on 1010.00 Force (and 1051.00 Taser Use) in October, 2012: .

We continue to urge the Bureau to number all of the sections of the Directives, such as the Definitions, Policy and Procedure sections (our comments here refer to the Procedure section unless otherwise noted). Interestingly, 630.60 includes just such a numbering scheme even though there are no definitions in Section 2; this shows that the Bureau was numbering the Definitions in 2014 but stopped without explanation.

DIRECTIVE 905.00 NON-FORCE AFTER ACTION REPORTING

As noted in our comments on 1010.00, the previous requirement for completing an After Action Report following "crowd events" (old 940.00 Section 1.6.1) is now limited to when there is a "significant civil disturbance requiring an organized police response" (Directive 905.00 Section 1.4). This is far too narrow a scope, since, as PCW has documented, the PPB does not always record individual uses of force at protest actions (such as the woman who was pepper sprayed outside of City Hall on October 12, 2016). Therefore such reports should be required any time police show up uninvited and/or use any kind of force during an event involving a crowd.

It's not clear why finding "policy, training, tactical or equipment concerns" should only be sent to the Assistant Chief (Section 3.2), and no longer to Professional Standards (old 940.00 Section 5.2). PSD was also taken out of the provision allowing for use of force

Directive 905.00 Feedback

investigations to be reassigned from a supervisor (Section 3.4). The best reading on this is that the Assistant Chief might use discretion to assign the investigation to PSD, but the only specific option listed in the Directive is the Detective Division.

The only change in this Directive since July 2017 is to the section on Vehicle Pursuits (1.3). New language requires a non-force After Action for pursuits "without force implications."

CONCLUSION

As we have stated before, Portland Copwatch appreciates the Bureau reaching out to the community for comment, but are looking forward to more of an open dialogue when the Portland Committee on Community Engaged Policing gets underway (if ever). We continue to urge the Bureau to be open to revising its timelines for review to ensure meaningful public input can take place. One of the only reasons we were able to tackle these rather long Directives is that we had made comments on them earlier. Our commentary would be much shorter if we could just be thanking the Bureau for adopting our advice, but such changes are few and far between.

Portland Copwatch

Q2 Contact Information (optional)

Name

Portland Copwatch

Email Address

#1

COMPLETE

Collector: Web Link 1 (Web Link)
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Q1 Please provide feedback for this directive

COMMENTS ON FORCE, REPORTING, WEAPONS AND VEHICLE INTERVENTION DIRECTIVES, DECEMBER 2018

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

Below are our comments on the Directives posted for review on December 1 and December 14 . As we noted in an email to the PPB, the comment the Bureau attached to Directive 1010.10 on Deadly Force investigations states that the Bureau received no feedback on that policy in March, but 1010.10 was not posted for review in March. (The Bureau replied that the Directive was actually posted in April, but no public notification went out.)

All the other Directives posted on December 1 are ones we did comment on at that time, whereas the "odd Directive out" number 313.70 on Associations was previously posted in draft form for comment in June 2016, but apparently was never changed.

We continue to be concerned that Directive 1010.00 on Use of Force defines de-escalation both as lowering tension at a scene and using less force on a suspect. We repeat here our opposition to changes made in 2017 to these policies: they delay the requirement for officers involved in the death of a civilian to write force reports until after a criminal investigation has ended, and if their gunfire did not result in death, they leave such reporting up to the discretion of supervisors.

Going through the revised Force policy, we note that very few suggestions from Portland Copwatch were incorporated, while many suggestions from the ACLU were adopted in one way or another. It is really too bad that the Bureau discusses these changes behind closed doors as a public meeting with various stakeholders could lead to better policy making which doesn't require repeated fixing. We point the Bureau to the COCL's reports where they respond to various recommendations one by one explaining whether and why they include various suggestions into their final reports. While there is a place for the anonymous listings in the Bureau's publication of incoming comments, groups which wish to be identified (including ACLU and Portland Copwatch), and City-run advisory bodies (such as the Training Advisory Council, Citizen Review Committee, Community Oversight Advisory Board and, if they ever start looking at policies, the Portland Committee on Community Engaged Policing/PCCEP) should know what became of their suggestions.

An overall note we included as a footnote last time, but which requires serious attention: The Bureau should stop using the word "tool" to refer to weapons, as is done repeatedly in Directive 1010.00, and in Directive 1020.00 (proposed Section 5.4.3). These items are all designed to kill, harm, wound, or physically coerce people to follow police orders, not items used to hang kitchen doors or repair automobiles.

PCW acknowledges that the PPB is changing all language about previous shotgun-loaded "less lethal" munitions to reflect the new 40 MM launcher system in Directives 1010.00 and 1020.00.

We continue to urge the Bureau to give different labels to all of the sections of the Directives, such as the Definitions, Policy and Procedure sections (our comments here refer to the Procedure section unless otherwise noted) so there are not multiple sections

Directive 905.00 Feedback

numbered "1." There is currently only one section in 313.70 but as the Bureau adds its new numbering scheme, if other sections are added we hope these changes will be considered.

DIRECTIVE 905.00 NON-FORCE AFTER ACTION REPORTING

It is clear that the Bureau is moving the goalposts rather than improving the way they play the investigation game. Even though the DOJ is requiring all investigations to be done in 180 days, the deadlines for RU managers to review Sergeant's reports is being changed from 21 to 28 days (Section 2.3) and for Assistant Chiefs to review the reports from 28 to 35 days (Section 2.4).

Some other questionable changes include:

--Officers being injured do not trigger After Action reports if they are merely treated at a hospital, only if they are admitted (Section 1.1.1);

--No After Action report is being required if SERT officers show up without a supervisor (Section 1.5);

--After Action reports on destroying firearms and narcotics are no longer being required (proposed deleted Section 1.7); and

--an RU Manager can be the final reviewer of After Action reports if only one PPB unit is involved in the action (proposed new Section 2.3.1).

Once again, as we noted in our comments on 1010.00, the previous requirement for completing an After Action Report following "crowd events" is now limited to when there is a "significant civil disturbance requiring an organized police response" (Section 1.4). This is too narrow a scope, since the PPB does not always record individual uses of force at protest actions. Therefore, such reports should be required any time police show up uninvited and/or use any kind of force during an event involving a crowd.

PCW also still suggests that "policy, training, tactical or equipment concerns" should be sent to Professional Standards in addition to the Assistant Chief (Section 3.2), and PSD should be a place for a Supervisor to direct an investigation in addition to Detectives (Section 3.4).

CONCLUSION

Portland Copwatch would still like to see more of an open dialogue around the Directives, perhaps under the auspices of the PCCEP. We also note that while these comments are easier for PCW to make since we've looked at all of these Directives in previous forms, the timelines are still restrictive for many people, including groups who only meet once a month.

Portland Copwatch

Q2 Contact Information (optional)

Name

Portland Copwatch

Email Address
