

Executive Summary

Directive 0312.50, Identification

Introduction

The Portland Police Bureau began reviewing Directive 0312.50, Identification, in December 2021. The Bureau posted the directive for First Universal Review in January 2022 to seek public comments on the directive. The Bureau posted a revised draft of the directive in June 2022 to seek public comments on proposed changes. The final, revised directive contains several updates. Most changes reflect new requirements under Oregon state law regarding when police must identify themselves, exceptions to the requirement to identify, and Bureau identification investigation procedures. The Bureau's directive is more restrictive than state law, containing more proactive requirements.

Public Comments

The Bureau received feedback during both universal review and public comment periods. Public comments indicated that Bureau member identification is an important topic to community members, and that police self-identifying in a forthcoming and respectful manner is paramount to community trust. The community clearly expects compliance with this directive and accountability for members.

The Bureau received several comments suggesting that the former directive's exceptions to the requirement that members must self-identify were too broad and seemed to swallow the rule. The Bureau removed the provision allowing supervisors to relieve members of the Bureau's identification mandate as inconsistent with state law.

One comment sought additional guidance in the directive for members who fail to follow the directive or who make sarcastic responses, suggesting admonishment. The directive includes references to both Directive 0310.00 Professional Conduct and Courtesy, and Directive 0315.00 Satisfactory Performance, which better capture the concern expressed by the comment and set forth clear expectations for member professionalism.

During Second Universal Review, several comments asserted that the length of time for the Bureau to investigate and provide the identity of a particular member was too long. The timeline is set forth by state law, and seeks to establish a minimum standard for compliance.

During Second Universal Review, the Bureau received several comments requesting the Bureau to keep the proactive requirement for members to provide business cards, which had been removed and replaced with state law which only requires identification upon request. In the final directive, the Bureau reverted back to the more proactive requirement, while maintaining state law's standards regarding exceptions to the requirement to provide identification.

Finally, during Second Universal Review, the Bureau received comments about removing the provision requiring supervisors to document any authorization they give to members to deviate from the policy. That provision was deleted as the directive no longer allows for supervisors to relieve members of satisfying the directive. Accordingly, the documentation requirement no longer applies.

The Revised Directive

The Bureau made small changes to Directive 0312.50, Identification. Most changes involved ensuring adherence to new state law, established by House Bill 3355 (2021). The directive establishes a maximum timeline/minimum standard for the Bureau to investigate and respond to requests for member identification. The directive also adopts the state law standard for exceptions to the requirement to provide identification. The directive maintains its proactive, affirmative duty to provide business cards. Finally, the Bureau revised the directive for active voice and clarity.

Conclusion

Revised Directive 0312.50, Identification, includes updates required by state law and sets forth clear expectations for members to identify themselves in furtherance of transparency and building community trust.

The Bureau welcomes further feedback on this directive during its next review.

This directive goes into effect December 15, 2022. Published on November 17, 2022.

0312.50, Identification

Refer:

- Directive 0025.00, Procedural Justice
- Directive 0310.00, Professional Conduct and Courtesy
- Directive 0315.30, Satisfactory Performance
- Directive 0635.10, Portland Police Bureau Response to Demonstrations and Public Order Events
- Directive 0900.00, General Reporting Guidelines
- Directive 1010.10, Deadly Force and In-Custody Death Reporting and Investigation Procedures

Policy:

1. The Portland Police Bureau is committed to community policing and positive, transparent community interactions. Members shall demonstrate professionalism and respect by identifying themselves in the course of their work as outlined in this Directive.

Procedure:

1. Receipt of Identification:
 - 1.1. Members shall receive official Bureau-issued identification (e.g. badges, nametags, identification cards, business cards, etc.) to be used for official business (e.g. community relations, operations, investigations, report writing, etc.). Members shall ensure they have official Bureau-issued identification and an adequate supply of Bureau-issued business cards at all times while on duty.
2. Display of Identification:
 - 2.1. Members in uniform shall visibly display their Bureau-issued badge and nametag on their outermost garment and carry their Bureau-issued I.D. while on duty.
 - 2.2. Professional staff and non-uniformed sworn members shall carry Bureau-issued identification at all times while on duty.
3. Providing Identification:
 - 3.1. If practical, safe, and tactically feasible, members shall identify themselves by name and offer their Bureau-issued business card (containing their Department of Public Safety Standards and Training (DPSST) number) when responding to a call for service, engaging in self-initiated activity, making a traffic or pedestrian stop, or upon request of a member of the public.
 - 3.1.1. This requirement does not apply to members participating in undercover law enforcement operations.

4. Identification Investigations Pursuant to State Law, Excluding Officers Participating in Undercover Law Enforcement Operations.
 - 4.1. If a member of the public provides a full badge number to the Bureau, the Bureau shall provide the requester with the name of the officer within 14 days after receiving the request.
 - 4.2. If a member of the public requests that the Bureau identify an officer and provides: 1) a partial name of the officer; 2) the full or partial badge number or other identifying number of the officer; 3) a photograph of the officer; 4) a full or partial license plate or other identifying number of a police vehicle; 5) a physical description of the officer; or 6) the location, date, and time at which the officer was present during the event, the Bureau shall:
 - 4.2.1. Within seven days of receiving the request, confirm to the requester the receipt of the request; and
 - 4.2.2. Within 14 days of receiving the request, provide the requester with the name of the officer and their DPSST number or an explanation of why the Bureau could not perform the identification, which may include reasons set forth in Directive 1010.10, Deadly Force and In-Custody Death Reporting and Investigation Procedures.
5. Supervisor Responsibilities:
 - 5.1. Supervisors shall ensure members have official Bureau-issued identification during inspections.
 - 5.2. Supervisors shall ensure members display and use identification as required by this Directive, and ensure that identification is not misused (e.g. identification is not used for personal gain, identification is not used for coercion or retaliation, identification is not lent to others, identification is not used to authorize external communications, etc.).
6. Crowd Management.
 - 6.1. For additional guidance on identification requirements during crowd management, refer to Directive 0635.10, Portland Police Bureau Response to Demonstrations and Public Order Events.

Effective: 12/15/2022
Next Review: 12/15/2024

3120312.50, Identification

Refer:

- Directive ~~1200025.00, Inspections, Responsibility, and Authority~~ Procedural Justice
- Directive ~~3100310.00, Conduct,~~ Professional Conduct and Courtesy
- Directive 0315.30 Satisfactory Performance
- Directive 0635.10 Portland Police Bureau Response to Demonstrations and Public Order Events
- Directive 0900.00 General Reporting Guidelines
- Directive 1010.10 Deadly Force and In-Custody Death Reporting and Investigation Procedures

Policy:

1. The Portland Police Bureau is committed to ~~a relationship-based style of~~ community policing ~~that promotes and~~ positive, transparent community ~~relations~~ interactions. Members ~~will~~ shall demonstrate professionalism and respect by identifying themselves in the course of their work as outlined in this Directive.

Procedure:

~~1. Member Responsibilities:~~

~~2.1.~~ Receipt of Identification:

- ~~2.1.1.1.~~ Members will ~~shall~~ receive official ~~versions of~~ Bureau-issued identification (e.g. badges, nametags, identification cards, business cards, etc.) to be used ~~in connection with~~ for official business (e.g. community relations, operations, investigations, report writing, etc.). Members will ~~shall~~ ensure they have official ~~versions of~~ Bureau-issued identification and an adequate supply of Bureau-issued business cards ~~in anticipation of~~ at all times while on duty.

~~3.2.~~ Display of Identification:

- ~~3.1.2.1.~~ Members in uniform will ~~shall~~ visibly display their Bureau-issued badge and nametag on their outermost garment and carry their Bureau-issued I.D. while on duty.
- ~~3.2.2.2.~~ ~~Civilian members~~ Professional staff and ~~non-uniformed~~ sworn members ~~wearing civilian attire will~~ shall carry Bureau-issued identification ~~on their person~~ at all times while on duty.

~~4.3.~~ ~~Use of~~ Providing Identification:

- ~~4.1.3.1.~~ ~~Except as provided in Section 1.3.2, Bureau~~ If practical, safe, and tactically feasible, members will ~~shall~~ identify themselves by name and offer their Bureau-issued business card ~~(containing their Department of Public Safety Standards and Training (DPSST) number)~~ when responding to a call for service, engaging in self-initiated

activity, making a traffic or pedestrian stop, ~~conducting an investigation~~, or upon request of a member of the public.

~~4.1.1. Members are not required to identify themselves or provide a Bureau issued business card when doing so would:~~

~~4.1.1.1. Compromise the member's safety,~~

~~4.1.1.2. Impair the performance of police duties at the scene, and/or~~

~~3.1.1. A supervisor has relieved the This requirement does not apply to members participating in undercover law enforcement operations.~~

4. Identification Investigations Pursuant to State Law, Excluding Officers Participating in Undercover Law Enforcement Operations.

4.1. If a member of the Bureau's public provides a full badge number to the Bureau, the Bureau shall provide the requester with the name of the officer within 14 days after receiving the request.

4.2. If a member of the public requests that the Bureau identify an officer and provides: 1) a partial name of the officer; 2) the full or partial badge number or other identifying number of the officer; 3) a photograph of the officer; 4) a full or partial license plate or other identifying number of a police vehicle; 5) a physical description of the officer; or 6) the location, date, and time at which the officer was present during the event, the Bureau shall:

4.2.1. Within seven days of receiving the request, confirm to the requester the receipt of the request; and

4.1.2.4.2.2. Within 14 days of receiving the request, provide the requester with the name of the officer and their DPSST number or an explanation of why the Bureau could not perform the identification mandate, which may include reasons set forth in Directive 1010.10 Deadly Force and In-Custody Death Reporting and Investigation Procedures.

~~4.1.2.1. Members are required to document refusals to provide identification in an appropriate police report.~~

5. Supervisor Responsibilities:

5.1. Supervisors ~~will~~shall ensure members have official ~~versions of~~ Bureau-issued identification during inspections.

5.2. Supervisors ~~will~~shall ensure members ~~are displaying~~display and ~~using~~use identification as required by this Directive, and ensure that identification is not misused ~~in accordance with expectations outlined in other directives~~ (e.g. identification is not used for personal gain, identification is not used for coercion or retaliation, identification is not lent to others, identification is not used to authorize external communications, etc.~~)-.~~).

~~5.3. Supervisors are required to document in an appropriate police report or memorandum any authorization given by the supervisor to relieve a member or members of identification mandates (e.g. uniform requirements, detail assignments, safety concerns, impaired performance of police duties, etc.).~~

6. Crowd Management.

6.1. For additional guidance on identification requirements during crowd management, refer to Directive 0635.10, Portland Police Bureau Response to Demonstrations and Public Order Events.

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 9:56:02 AM
Last Modified: Monday, January 03, 2022 10:00:17 AM
Time Spent: 00:04:15

Page 1

Q1

Please provide feedback for this directive

1.3.2 seems impossibly broad, and will provide excuses for officers not to identify themselves in essentially any situation. They can simply claim it would interfere with their duties, no matter the circumstances, much like they've dodged the tear gas ban with the vague "riot" exception when officers can simply declare riots at arbitrary whim. This needs to be much more narrow and specific, or even better, PPB officers need to simply have the courage to be identifiable and responsible for their conduct on the job.

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name	Why would I invite retribution this way?
------	--

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 9:58:30 AM
Last Modified: Monday, January 03, 2022 10:09:08 AM
Time Spent: 00:10:37

Page 1

Q1

Please provide feedback for this directive

0312.50.1.2.1 "Visibly displayed" should be clarified. Officers use pens to obscure name tags and numbers, this should be prohibited more explicitly since it is commonly done. I propose "visibly displayed in a manner able to be read (unobscured)" Additionally outer garmets should allow for pens in places that do not obscure name tags. A minimum font size should also be specified.

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 11:01:25 AM
Last Modified: Monday, January 03, 2022 11:04:49 AM
Time Spent: 00:03:23

Page 1

Q1

Please provide feedback for this directive

Officers that fail to provide identification will be treated as armed citizens and approached as such, creating a more dangerous situation. This is a bad policy, as the definitions constituting when ID isn't required is not well defined, and can potentially lead to the injury or death of an officer in a situation where it was unnecessary.

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 1:28:06 PM
Last Modified: Monday, January 03, 2022 1:31:47 PM
Time Spent: 00:03:40

Page 1

Q1

Please provide feedback for this directive

Section 1.3.2. completely negates the whole thing. Police will fully abuse this, rendering the entire directive useless. If an officer is too afraid to own up to their own actions, maybe they shouldn't be an officer. The people of Portland should reject this in its entirety.

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, January 16, 2022 4:53:54 PM
Last Modified: Sunday, January 16, 2022 4:54:24 PM
Time Spent: 00:00:29

Page 1

Q1

Please provide feedback for this directive

COMMENTS ON MENTAL HEALTH, CUSTODY, IMMIGRATION AND OTHER DIRECTIVES, JANUARY 2022

To Chief Lovell, Capt. Parman, Lieutenant Morgan, PPB Policy Analysts, Compliance Officer/Community Liaison Team, Portland Committee on Community Engaged Policing, US Dept. of Justice, Citizen Review Committee and the Portland Police Bureau:

Below are Portland Copwatch's comments on the 13 of the 15 Directives posted for review in January . The "First Universal Review" is particularly challenging, not only because of the very short (15 day) timeline, but because it is difficult to know if the Bureau intends to make any changes to the policies. Because the public is presented with the policies as they currently exist, it is extremely challenging to determine if any changes were made between the last Second Universal Review and the present time. We strongly suggest that the Bureau include both (a) a statement of intent if there is a particular reason a Directive has been chosen and (b) a link to an existing implementation memo which might include a final redline of the previous iteration and the Bureau's reflections on public comments.

The wide variety of topics in this set of Directives is offset for us by the fact that we've made comments on all of them, except for 850.30 on Juveniles, previously. We've tried to indicate where the Bureau has made its (rare) changes reflective of our input. Otherwise, many of these comments are repeats of ones we made between January 2015 and January 2021.

Portland Copwatch (PCW) has chosen again not to comment on 660.32 Informant Processing because of the distasteful nature of such government-sponsored subterfuge, and 630.50 on Medical Aid, to which no changes have been made despite its previous posting in 2016.

We continue to ask that the Bureau add numbers or letters to the Definitions, Policy and Procedure sections to make them easier to reference. Our comments below refer to the Procedure section unless otherwise noted.

DIRECTIVE 312.50 IDENTIFICATION/BUSINESS CARDS (last comments September 2015)

--Avoid Snarky Responses: This Directive should have clear guidelines for officers who do not have business cards or who choose to give their names and Department of Public Safety, Standards and Training (DPSST) numbers through some other means. We do not believe it is consistent with this policy for officers to, as we've heard several times, tell a community member "my name is on your ticket."

--Avoid Snarky Responses II: Section 1.3 directs officers to identify themselves by name and offer business cards in most circumstances. The old directive asked them to also give out their member number (DPSST number), and specifically said "ID numbers will be provided when citizens request a badge number." This language was inserted to prevent a repeated tactic by officers, who used to tell community members "I don't have a badge number." We again urge the Bureau to add this language back into this Directive.

--Undo Damage of 2020 Exceptions: In our reading, exceptions to the Identification rules in Section 1.3.2 about officers "identifying themselves or providing a business card" do not (or should not) apply to Section 1.2.1 requiring officers to wear their nametags on their outermost garment. The use of numbers and lack of officer names on uniforms made holding officers accountable for violence at racial justice protests in 2020 nearly impossible.

CONCLUSION

We recognize that the Directives development process has evolved since it began, particularly with the addition of redline versions and

0312.50 Directive Feedback (1UR)

public comments posted in the Second Universal Review. There is still more to be gained by adding the information suggested in our introduction and holding public meetings to exchange ideas about suggested changes. Several advisory bodies including the Citizen Review Committee, Portland Committee on Community Engaged Policing and Training Advisory Council all have a stake in various Directives, but the first two only meet once a month and the latter only meets every two months, so they can't easily meet the Bureau's deadlines for input.

Many of these policies could help reduce harm against vulnerable parts of our population. However, the incidents of use of deadly force against people in mental health crisis continues unabated, with at least three of eight people shot by the PPB in crisis in 2021. Notably, the last time the Bureau was involved in this many deadly force incidents was 2005. Yet after nine years of oversight by the US Department of Justice, it seems the ideas of de-escalation and other tactics outlined in these policies are thrown out the window because an officer or officers default to pulling firearms, pile on an agitated person, or using so-called "less lethal" weapons. The number one priority should always be respecting the dignity and humanity of the civilian and making sure everyone gets to go home safe at night-- whether or not a suspected mental health issue is at play.

We appreciate being invited to provide input into the Bureau's policies. Our goal at Portland Copwatch is that so long as there is a Police Bureau, its should be free of corruption, brutality and racism. We hope that our suggestions will help lead to such a culture.

--dan handelman (and other members of)
--Portland Copwatch

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name

Portland Copwatch

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, January 16, 2022 7:51:39 PM
Last Modified: Sunday, January 16, 2022 7:51:53 PM
Time Spent: 00:00:14

Page 1

Q1

Please provide feedback for this directive

- 1.3.2 - consider rewriting this for clarity. 1.3.2.3 and 1.3.2.4 wording don't fit with how the list was introduced ("... when doing so would: ... 1.3.2.4 Members are required...")

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, June 02, 2022 3:24:38 AM
Last Modified: Thursday, June 02, 2022 3:25:34 AM
Time Spent: 00:00:55

Page 1

Q1

Please provide feedback for this directive

If police are required to give name.

What's to stop criminals from finding them and their families?

I think some protection should be provided to police.

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, June 08, 2022 12:09:48 PM
Last Modified: Wednesday, June 08, 2022 12:11:58 PM
Time Spent: 00:02:10

Page 1

Q1

Please provide feedback for this directive

Most of this sounds good to me. The public has the right to know the name of the officer, either by reading his badge, asking him, or obtaining the info from the bureau. However, 7 to 14 days for the information to be given out to the person requesting this from the bureau seems too long. Why can't it be done in 1 or 2 days?

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, June 17, 2022 1:11:48 AM
Last Modified: Friday, June 17, 2022 1:25:54 AM
Time Spent: 00:14:06

Page 1

Q1

Please provide feedback for this directive

I have been pro police for years, Having worked with Portland police with the Portland Marathon. But recently the number of videos out there across the country where police disrespect civilians is causing the spread of hatred of police. Police unconstitutionally demand ID from people that have not committed a crime or traffic violation. But when officers are asked to identify, to many times they ignore the request, refuse to identify or flippantly say "right here". Any officer that that is not involved in a high risk activity has the time to respond Officer last name, badge NNNN. this takes less than 5 seconds and nationwide videos show officers arguing for 30 seconds to over a minute. Any officer that does not respectfully ID to a citizen they approached. Should be suspended without pay for 1 week. If you want a desired behavior there have to be significant consequences for not complying. Just like for a civilian, who fails to identify when they have been legally stopped for a traffic violation or where there is RAS that the have, are or are about to commit a crime. There need to be significant penalties both ways. Police that disrespect the public, bring the hate and the change starts when the police first engage the public.

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name **Glenn Sullivan**

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, June 28, 2022 9:29:13 AM
Last Modified: Tuesday, June 28, 2022 9:33:01 AM
Time Spent: 00:03:47

Page 1

Q1

Please provide feedback for this directive

The changes here will do nothing to increase transparency and accountability for PPB to the public. This is a sham change to make people think something is being done when really it provides more cover for PPB to commit violence on Portland citizens. Every other job requires accountability, I know this well as a teacher, so why give the potentially deadly force of the PPB an exception. This, to me, indicates a willingness to put ordinary citizens in harms way. Absolutely disgusting, and I can't wait to vote out anyone who supports this.

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name **Rana Tahir**

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, June 28, 2022 9:39:41 AM
Last Modified: Tuesday, June 28, 2022 9:41:00 AM
Time Spent: 00:01:18

Page 1

Q1

Please provide feedback for this directive

Please close loopholes that allow officers to give their longer employee ID during certain events and make sure they can't skirt the tougher policy!

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, June 28, 2022 12:54:02 PM
Last Modified: Tuesday, June 28, 2022 12:58:50 PM
Time Spent: 00:04:48

Page 1

Q1

Please provide feedback for this directive

"Must" is clearer than "shall" - you should use that instead

Keep the requirement to give business cards upon request - it doesn't help transparency to let that be at the discretion of the officer.

"If practical, safe and tactically feasible, upon request by a member of the public, members shall provide their name and Department of Public Safety Standards and Training (DPSST) number to the member of the public." This has far too much room for interpretation. This essentially negates the entire point of this directive - an officer just needs to say "it wasn't safe". If your goal is actual transparency, these carve outs need to be very limited and not subject to wide officer discretion.

Please maintain the requirement that supervisors document any permission to deviate from identification requirements.

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, June 29, 2022 2:06:51 PM
Last Modified: Wednesday, June 29, 2022 2:07:12 PM
Time Spent: 00:00:21

Page 1

Q1

Please provide feedback for this directive

COMMENTS ON LESS LETHAL, FORCE REPORTING AND IDENTIFICATION DIRECTIVES, JUNE 2022

To Chief Lovell, Inspector Buckley, 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 comments from Portland Copwatch (PCW) on the Directives posted for review in June which focus on "less lethal" weapons, force reporting and identification < <http://www.portlandoregon.gov/police/59757> >.

With the weapons policy (1015.00), we seem to have gotten what we'll call the "boomerang effect" in which we called out the Bureau for removing some information (allowable use of the weapons) but leaving in other (prohibited uses). Rather than add back the allowable uses section, the PPB removed both sections in the new draft. There are still some sections outlining restrictions on a per-weapon basis, but no broad restrictions.

Similarly, we expressed concern last month that the Directive on police violence against animals removed reporting requirements. The PPB has cut those requirements out of the Force Reporting Directive as well (910.00)

There also seem to be good developments in the Identification Directive (312.50), but perhaps more clarity is needed.

Once again we suggest that the Bureau should give labels to all of the major sections of the Directives, such as the Definitions, Policy and Procedure sections. Our comments refer to the Procedure section unless otherwise noted.

DIRECTIVE 312.50 IDENTIFICATION/BUSINESS CARDS (last comments --January 2022)

--Positive Change for Transparency: It appears on its surface that exceptions to the requirement to always wear identification, provide a name and/or business cards have been removed. We think this means there will no longer be blanket exceptions to the important rule in Section 2.1: "Members in uniform shall visibly display their bureau-issued badge and nametag on their outermost garment and carry their Bureau-issued ID while on duty." The exceptions for members was removed as well as the Supervisors' ability to "relieve members of identification mandates." Renaming the member section from Use of Identification to Providing Identification (Section 3) also emphasizes the importance of officers getting that information to the public.

--And the Bureau Taketh Away: Section 3.1 gives a new set of exceptions to giving a name and Department of Public Safety, Standards and Training (DPSST) number, saying it has to be "practical, safe and tactically feasible" to do so.

---In addition, giving out a business card was required by the previous version in what is now Section 3.1.1, but is now made optional. The requirement was a result of community-led demands and should be restored.

--Badge Vs. DPSST Number, Continued: The Bureau specifically referencing an officer's DPSST number in Section 3.1 is a good step forward and seemingly responsive to our previous comments; however, that number is referred to as a "badge number" in Section 4.1. The Directive should clearly state that "badge number" means a DPSST number.

--How Long Has This Been Going On?: It's not clear why the Bureau has a full 14 days to provide an employee's name to a member of the public who provides a full DPSST number (also Section 4.1). Once the number is given, looking up the name should take a matter of seconds either in the Bureau's database or the DPSST online system.

---Worse, Section 4.2 gives the PPB seven days to acknowledge a public request if there's only a partial name, partial "badge number" (see above), photo, police vehicle number, physical description or location and date of the encounter. Then the Bureau has an extra seven days to provide the information or reasons they could not find it.

--Common Courtesy: We will repeat here that officers should not give sarcastic feedback to community members who ask for their identification, including but not limited to officers who have told people they can find a name/DPSST number on a citation or summons.

CONCLUSION

Once again, having thirty days to review these Directives is helpful, but Portland Copwatch would still like to see review periods extended to allow for groups who only meet once a month to give input. The Chief has spoken publicly about how the Directives process shows trust-building, but the low level of participation is likely in part a result of the short time frames. People also do not generally have the time to read through the entire policies, especially the longer ones, so a summary page of changes made and the reasons for them would go a long way to improve the process. PCW also continues to believe the Bureau would benefit by holding public meetings to discuss the intent behind proposed changes and to take questions about community ideas for improvements to policies.

Thank you

--dan handelman and other members of
Portland Copwatch

Q2

Contact Information (optional - your name will be visible on PPB's website)

Name

Portland Copwatch

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, June 29, 2022 10:02:45 PM
Last Modified: Wednesday, June 29, 2022 11:01:47 PM
Time Spent: 00:59:02

Page 1

Q1

Please provide feedback for this directive

This directive should be strengthened. I suggest replacing "shall" with "must," in compliance with federal plain language recommendations, and I would like to see more plainly defined principles for what constitutes "practical, safe, and tactically feasible." Without stricter definitions, this provides excessive leeway for officers to conceal their identities to the detriment of public safety. Guidelines that define clear consequences for altering or obscuring identification are also important. I am also troubled to see that this directive omits any requirement for supervisors to document which officers are excused from identification requirements.

Q2

Respondent skipped this question

Contact Information (optional - your name will be visible on PPB's website)
