SETTLEMENT AGREEMENT ON POLICING IN PORTLAND

[DRAFT] Semi-Annual Compliance Report
January 1, 2026 – June 30, 2026

Prepared by the Independent Court-Appointed Monitor

NOVEMBER 4, 2026

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Letter from the Monitor

On behalf of the Independent Court-Appointed Monitoring Team, I am pleased to present our fourth semi-annual report on the City's compliance with the Settlement Agreement on Policing in Portland. As we completed the reviews and analyses required to produce this report, we were cognizant of the change in status of multiple provisions of the Agreement that has been achieved since the start of the Monitorship. For our first semi-annual report, we assessed the City's compliance with 40 of the Settlement Agreement's paragraphs, and we evaluated the City's self-assessment of 15 others to determine whether Substantial Compliance had been maintained. For this current report, we assessed the City's compliance with 12 of the Agreement's paragraphs and evaluated its self-assessments of 17 others; 26 paragraphs (of the original 55 that we assessed or evaluated) have reached the status of Partial Termination. On balance, these changes represent significant and measurable progress made by the City toward achieving full Substantial Compliance with the Settlement Agreement.

The findings in this current report indicate that the City's progress continued during the most recently completed Reporting Period (Q1-Q2 2026). Even so, the Monitoring Team has identified both room for further improvement in a handful of areas as well as potential obstacles to further progress in others. As is the case with each of our semi-annual compliance reports, and as is called for by the Settlement Agreement, we have included recommendations intended to elucidate how the City can achieve Substantial Compliance if it has not yet done so, and how to most effectively maintain it if it has. Beyond those recommendations, the Monitoring Team remains committed to engaging in effective communication with the City about any aspects of its compliance efforts that might benefit from further discussion, clarification, or deliberation.

At the same time that the number of paragraphs under review by the Monitoring Team has decreased, the opportunity for us to focus on some of the outcome measurements identified in the Settlement Agreement has broadened. In addition to assessments of compliance with the Agreement, quantitative and qualitative measurements are important to make insofar as they may speak to whether the Agreement's intended outcomes are occurring in practice. For this current report, we were pleased to build on the initial measurements that were conveyed in our previous one.

While some aspects of the Monitorship of the Settlement Agreement change from one Reporting Period to the next, the Monitoring Team's commitment to listening to voices from every corner of the Portland community has not. From the very start of our term, we have valued the opportunity to hear diverse perspectives, experiences, challenges, and successes related to the deeply important and impactful matters that are addressed by the Agreement. We appreciate all of the feedback we receive from the community (including, but not limited to, commentary on reports such as this one) as we believe it is necessary for us to most effectively meet our own responsibilities pursuant to the

Agreement. We look forward to maintaining our commitment to community engagement going forward.

Similarly, it is important to reiterate the Monitoring Team's unchanged adherence to the principle of independence in all of the work that we do pursuant to the Settlement Agreement. With regard to this report specifically, our determinations about the status of the City's compliance with the Agreement's requirements represent our independent assessments reached in reliance on relevant information made available to us by the City or gathered through our own efforts (including, but not limited to, engagements with the community). Our compliance findings are not, and must not be, unduly influenced based on the preferences of either of the Parties to the Settlement Agreement or of any other stakeholder.

On behalf of the Monitoring Team, thank you for allowing us to present our fourth semi-annual report on the City's compliance with the Settlement Agreement.

Very respectfully,

Mark P. Smith
Lead Monitor

Work Conducted by the Monitoring Team During the Reporting Period

During the Reporting Period covering January 1 – June 30, 2026, the Monitoring Team continued to conduct our recurring assessments of the City's compliance with the Settlement Agreement. These assessments were based on reviewing and analyzing numerous different materials provided to us by the City, including investigations into the use of force by PPB officers, use of force data, administrative investigations of alleged misconduct by PPB members, and Body-Worn Camera (BWC) recordings. They were also based on our own direct observations as well as multiple in-person and remote meetings and conversations we had with City and PPB leadership, the United States Department of Justice, and a broad spectrum of group and individual stakeholders from the Portland community (as further detailed below).

Beyond compliance assessments, the Monitoring Team completed other core duties of the Monitorship, as set forth in the Settlement Agreement. These included: providing feedback on multiple new and/or revised PPB training curricula as well as proposed revisions to PPB policy; consulting on the development of self-monitoring plans by the City and PPB as well as evaluating the subsequent self-monitoring reports they produced in accordance with those plans; and participating in mediation with the Parties as well as a status conference to update the Court on key developments related to the Monitorship. We additionally worked closely with PPB to obtain data that we needed in order to conduct qualitative and quantitative outcome assessments, as further described by the Settlement Agreement.[1]

Monitoring Team members made multiple site visits to Portland; we engaged in discussions at PPB roll calls in each precinct; we observed debriefings on critical incidents that occurred during the Reporting Period; we spoke with staff from the Independent Police Review (IPR); we attended hearings of the Police Review Board (PRB), the Citizen Review Committee (CRC), and the Community Board for Police Accountability (CBPA); we met with CBPA staff and observed listening sessions related to the recruitment of the first Director of the Office of Community-based Police Accountability (OCPA); and we met with leadership from the Portland Police Commanding Officers Association (PPCOA) as well as the Portland Police Association (PPA).

In terms of community stakeholders, we arranged meetings with several different groups and individuals, and we were pleased to attend numerous meetings that were already scheduled by others.[2] In each of them, it was our goal to hear a variety of community perspectives on issues of

[1] A discussion of what we learned is in the "Outcome Measurements" section of our report.

[2] Some of the meetings were held in-person, others were conducted remotely, and some were a hybrid of those two.

relevance to the Settlement Agreement. Some examples of stakeholders we engaged with follow here:

- Albina Ministerial Alliance Coalition for Justice and Police Reform *(Enhanced Amicus)*
- Mental Health Alliance *(Amicus)*
- Citizen Review Committee member
- Coalition of Communities of Color
- Portland Committee on Community Engaged Policing
- Focused Intervention Team Community Oversight Group
- Latino Advisory Council
- Portland Copwatch
- Pacific Northwest Family Circle
- League of Women Voters of Portland
- Portland State University Interim Chief of Police
- Portland City Councilor (formerly)
- Member of United States Attorney's Office in Portland (formerly)
- Individual community members

Additionally, in May 2026, the Monitoring Team hosted its third Town Hall event—at the Mt. Scott Community Center. We continue to find tremendous value in these opportunities for direct engagement with the public. As has been true in the past, we received helpful feedback and suggestions during the most recent event on a draft of our third compliance report. We also heard many different opinions about how the City's efforts toward compliance with the Settlement Agreement are being perceived within various parts of the community.

Public input has always helped inform the Monitoring Team as we carry out our responsibilities pursuant to the Settlement Agreement, and we invite contact from anyone who might wish to get in touch with us regarding any issues of relevance to the Monitorship. Following is information on how to reach us:

The Monitoring Team can be reached via phone at: (503) 451-0289.
The Monitoring Team can be reached via email at: info@portlandpolicemonitor.com.
The Monitoring Team's website can be accessed at: portlandpolicemonitor.com.

Notes about Reading this Report

- The Independent Court-Appointed Monitoring Team's compliance assessment report is intended to be read in conjunction with the Settlement Agreement on Policing in Portland. In an effort to avoid being unnecessarily duplicative in this report, we have not reproduced verbatim the language of each Settlement Agreement paragraph that we assessed for compliance. Some of our written assessments do recite substantial portions of the Settlement Agreement's wording, while others move immediately into the assessment itself without the inclusion of any Settlement Agreement language. In either case, we wrote the report acknowledging that the most recent version of the Settlement Agreement filed with the Court is publicly accessible at any time should there be a desire to consult it, including on the Monitoring Team's website, here.

- As the Settlement Agreement periodically undergoes amendments and updates, it is important to note that the Monitoring Team gave consideration to all provisions of the Agreement that were in effect at any point during the Reporting Period (Q1-Q2 2026) as we conducted our compliance assessments.

- Additionally, in the interest of convenience, the Monitoring Team has provided summaries of each Settlement Agreement paragraph for which we assessed the City's compliance in the Appendix to this report.

    - These summaries are inclusive of paragraphs that were in self-monitoring status, which is discussed in greater detail later in this report. They are also inclusive of paragraphs that have become subject to partial termination—and, therefore, are no longer subject to our assessments of compliance—during the course of the Monitorship.

- Guided by the language of the Settlement Agreement as well as the historical reports on the City's compliance with it that were conducted by the Compliance Officer/Community Liaison, and as noted in the Monitoring Team's Methodological Plan, we used the following compliance standards in reaching our assessments:

    - **Substantial Compliance**: The City/PPB has satisfied the requirement of the provision in a comprehensive fashion and with a high level of integrity, and any violations of the Agreement are minor or occasional and are not systemic.
    - **Partial Compliance**: The City/PPB has made significant progress toward the satisfaction of the provision's requirements, though additional work is needed.
    - **Non-Compliance but Initial Steps Taken**: The City/PPB has begun the necessary steps toward compliance, though significant progress is lacking.

It is worthwhile to communicate the Monitoring Team's position that a finding of Substantial Compliance for a Settlement Agreement paragraph should not be interpreted as a minimization or diminution of the potential impact of any violations of that paragraph's requirements. For instance, even if a finding of Substantial Compliance is attained with regard to a paragraph that requires officers to use the least amount of appropriate force on a subject, the occurrence of even one event wherein an officer used more than the least amount of appropriate force on a subject may still result in severe consequences for that subject.

Conversely, it is also worthwhile to communicate the Monitoring Team's position that a finding of Partial Compliance for a Settlement Agreement paragraph should not be interpreted as a minimization or diminution of the measurable and verifiable progress made by the City/PPB toward compliance with that paragraph's requirements. The additional work that is needed in order to attain a finding of Substantial Compliance for such a paragraph may often be easily within reach for the City/PPB, specifically because of the progress they have already made and the efforts they have already expended toward meeting the Settlement Agreement's requirements.

- Some of the Monitoring Team's assessments of compliance with the Settlement Agreement relied on the selection of a sample of cases. The size of each sample was determined by the number of cases needed to attain a statistically sound sample based on the total number of cases provided by the City/PPB and may have included oversampling for rare events that were part of our assessment. For instance, when we drew a sample from the population of force events, it was selected using stratified random sampling to ensure an even distribution of events involving subjects with and without perceived mental health concerns.

  The Monitoring Team acknowledges that larger sample sizes are preferable to smaller ones, particularly insofar as the former allow for the review of a greater number of cases and, therefore, greater precision in making compliance assessments. In selecting our samples for this semi-annual compliance report, we strived to balance this position with other relevant variables including, but not limited to, the sample sizes used in the past by the Compliance Officer/Community Liaison, the time and resources available to us as we completed our assessments, and the type and amount of material we would need to review for each case in a given sample (such as multiple body-worn camera videos, for instance).

  The Monitoring Team also acknowledges that results from sampled data may differ to some degree from true compliance rates arrived at when all data available in a population of relevant cases is reviewed. To account for this and provide additional clarity to our findings, we calculated Margin of Error (MOE) estimates, where necessary, to characterize the precision of our findings. For example, a reported compliance rate of 94% may have an

MOE of ± 5%, which would be stated as (94% ± 5%). A more detailed discussion of when and how MOEs were calculated in this report can be found in the report's Appendix.

- As required by the Settlement Agreement, the Monitoring Team provided recommendations to the City/PPB on how to achieve and maintain Substantial Compliance for each paragraph we assessed as not having achieved that status during this Reporting Period.

  Additionally, in some instances where the Monitoring Team determined that the City/PPB was in Substantial Compliance with a particular Settlement Agreement paragraph during this Reporting Period, we offered recommendations intended to support ongoing compliance into and beyond future Reporting Periods. These recommendations should not be construed as detracting from the City's/PPB's achievement of Substantial Compliance with the associated paragraph.

  Finally, irrespective of compliance status, the Monitoring Team made additional recommendations about some paragraphs, based on our assessment, intended as technical assistance and/or general suggestions for improvements to the City/PPB, which are not required for compliance with the Settlement Agreement.

- Included in this report are two compliance tracking charts. The first chart shows the Monitoring Team's compliance findings for each paragraph that we were responsible for assessing during this Reporting Period; the second chart displays the Monitoring Team's compliance findings from the previous two Reporting Periods alongside those from the current one, in order to allow for a comparison of our findings over time. Both of these charts can be found directly following the Executive Summary below.

Executive Summary

This Semi-Annual Compliance Report, covering the period from January 1, 2026 through June 30, 2026 (the Reporting Period), evaluates the City of Portland's (City's) and the Portland Police Bureau's (PPB's) implementation of reforms required by the Settlement Agreement between the City and the United States Department of Justice (Settlement Agreement or Agreement). This report presents a detailed assessment of PPB's compliance with the active provisions of the Settlement Agreement, as independently evaluated by the Independent Court-Appointed Monitor (Monitoring Team).

This report also incorporates data-driven analyses, findings, and recommendations derived from documentary review, interviews, observations, and other source materials including data and information supplied by PPB. The report reflects the Monitoring Team's independent determinations regarding progress made as well as challenges remaining in reaching full compliance with the Settlement Agreement and achieving the goals of providing constitutional policing, demonstrating public accountability, and enhancing community trust.

The United States Department of Justice (DOJ) launched a civil rights investigation into the Portland Police Bureau on June 8, 2011, in response to concerns about patterns of use of force, particularly against individuals experiencing mental health crises. That investigation concluded on September 13, 2012, with the DOJ finding that PPB officers engaged in a pattern or practice of unnecessary or unreasonable force during interactions with people who had or were perceived to have mental illness. In addition to reaching these formal findings, the DOJ's examination identified concerns regarding the failure to provide adequate and timely access to medical care as well as the need to strengthen community policing. Specifically in relation to this last issue, the DOJ noted its observation that PPB could benefit from building additional bridges with minority communities, including but not limited to the African American community.

In response to the DOJ's findings, the City and the DOJ entered into a court-enforceable Settlement Agreement on October 26, 2012. The Portland City Council unanimously approved the Settlement Agreement on November 14, 2012, and the United States District Court, District of Oregon (the Court) formally accepted the Agreement and retained jurisdiction on August 29, 2014. The original Settlement Agreement contained a set of provisions for reform across multiple domains, including policies, training, supervision, accountability, community engagement, and oversight. Many amendments have been made to the Settlement Agreement over time, including some that were intended to strengthen aspects of the Settlement Agreement related to community oversight and others that were adopted to address PPB's response to protests and demonstrations following the murder of George Floyd by a police officer in Minneapolis, Minnesota. These amendments emphasized proper and justifiable uses of force, enhanced oversight and accountability, and additional transparency related to crowd management operations and other law enforcement activities.

Another amendment to the Settlement Agreement was entered as an Order of the Court on November 30, 2023, introducing Section XII, which established the role of an Independent Court-Appointed Monitor to assess the City's and PPB's compliance with the active provisions of the Agreement. On May 15, 2024, the Court appointed MPS & Associates, LLC to serve as the Independent Court-Appointed Monitor. This report represents the Monitoring Team's fourth semi-annual assessment since assuming that role.

The Monitoring Team found that the City was in Substantial Compliance with ten of the twelve Settlement Agreement paragraphs that remain subject to our compliance assessments. The City remained in Partial Compliance with the other two paragraphs, each of which warrants additional focused attention. The recommendations included in this report reflect the Monitoring Team's technical findings and strategic direction to promote and support full and sustained compliance with all remaining provisions of the Settlement Agreement.

Settlement Agreement Section III – Use of Force

The Monitoring Team's assessment of PPB's compliance with the Settlement Agreement's use of force provisions involved a review of relevant directives, 50 randomly selected events involving the use of non-deadly force, two deadly force investigations, two in-custody death investigations, PPB After-Action Reports (AAR), the PPB Office of the Inspector General (OIG) Applications of Force Report, quarterly and annual Force Analysis Summary Reports, and an audit of the Force Audit Report prepared by the OIG. Our reviews were guided by specific requirements set forth in Section III of the Settlement Agreement and were conducted by members of the Monitoring Team with subject matter expertise in law enforcement oversight, policy, and data analysis. Each case we reviewed was evaluated against the specific language of the Agreement, and multiple levels of review were employed to ensure rigor, objectivity, and consistency across all assessments.

The Monitoring Team's review of use of force investigations found that, overall, the numerous applicable requirements in the Settlement Agreement and PPB policy were consistently met with a high level of integrity. Some areas for improvement do remain, such as ensuring that the tasks required in the aftermath of each deadly force and in-custody death incident are always completed in a timely fashion, ensuring that supervisors fulfill of all their duties in response to the lowest levels of force, and documenting all corrective actions involving officers in the Employee Information System (EIS). However, any deviations identified by the Monitoring Team with respect to these matters were generally minor or occasional in nature, and they were exceptions to the broader findings of successful compliance on the part of the City with respect to applicable provisions of the Agreement.

Similarly, the Monitoring Team's review of PPB's audits of use of force data revealed that, in sum, they successfully analyzed all of the objectives they are required to focus on by the Settlement

Agreement. We believe the effectiveness of the audits could be enhanced by relying more heavily on their results to initiate appropriate interventions with officers, when warranted. Even so, the multiple ways in which PPB audits its own use of force data, in aggregate, cover all of the requirements for such audits set forth in the Agreement.

Settlement Agreement Section XI – Addendum of Additional Remedies

The Monitoring Team's review of the Addendum of Additional Remedies provisions focused on compliance with key technical and procedural requirements related to PPB's reporting systems, oversight structure transitions, an administrative investigation into the conduct of officers during crowd control events in 2020, and implementation of a body-worn camera program. Our assessments included document reviews, data sampling, interviews with relevant personnel, and audits of compliance across multiple operational domains. Each provision was evaluated for adherence to the Settlement Agreement. The City and PPB demonstrated their compliance with the Settlement Agreement in some of these areas, including the completion of the required administrative investigation as well as the development of force reporting and investigation forms that document when they are edited.

Our review also identified areas within this section where PPB and the City's work remains in progress. More consistent adherence to PPB's body-worn camera policy must continue to be reinforced, and the Oversight System (comprised of the CBPA and the Office of Community-based Police Accountability) must be fully staffed and operationalized as part of the City's new police oversight system. Collectively, our recommendations in this section reflect a continued focus on making further progress toward these critical yet complex and multifaceted requirements.

Discrete Sections in Self-Monitoring

Self-monitoring is a transition phase in which the City assesses its own compliance with provisions of the Settlement Agreement, thereby demonstrating its ability to maintain Substantial Compliance with certain provisions already found to be in that status by previous compliance assessments (including the Monitoring Team's). The Monitoring Team consults on the City's self-assessment methodologies and evaluates the City's self-assessment reports. If our evaluations find that Substantial Compliance with these provisions has been maintained—as self-assessed by the City in accordance with its self-monitoring plans—for two consecutive Reporting Periods, then the provisions become subject to termination.

Settlement Agreement paragraphs that are in self-monitoring status are grouped into discrete sections, which the Agreement defines as paragraphs or groups of paragraphs that do not necessarily implicate other provisions of the Agreement and may be assessed for compliance independently of other provisions. The part of our report focused on paragraphs in self-monitoring status is organized according to these discrete sections, as they are laid out in the Agreement itself. Across

these sections, a total of 17 Settlement Agreement paragraphs were in self-monitoring status during the Reporting Period. Our review of each of them examined PPB's and the City's self-monitoring plans, the primary materials upon which those plans relied in order to yield reliable compliance assessments, and the compliance reports ultimately produced by the City and PPB.

The Monitoring Team determined that the City maintained Substantial Compliance in accordance with its self-monitoring plans for all but one of the paragraphs in self-monitoring status. That paragraph requires (among other things) PPB supervisors to promptly review EIS records for officers new to their command. Although the City's self-assessment found that Substantial Compliance with this requirement had been maintained during the Reporting Period, our evaluation determined otherwise based on the rate at which the required reviews were completed in a timely fashion.

With regard to the Accountability section of the Settlement Agreement, and the paragraphs under it in self-monitoring status, our review determined that although the City's self-monitoring plans reflected the language of the Agreement in effect during the Reporting Period, the data it produced to evidence its compliance with the paragraphs and the self-monitoring reports it produced were generally focused on the requirements in language from previous versions of the Agreement. Given this discrepancy, our evaluations of the City's self-monitoring efforts with respect to these specific paragraphs focused on the evidence of compliance that was provided and the conclusions that the City reached in reliance on it.

Terminated Discrete Sections

As indicated in the Settlement Agreement, the termination of a discrete section reflects an acknowledgment of successful efforts by PPB and the City to demonstrate sustained Substantial Compliance with the paragraphs comprising the section. Once a discrete section is terminated, it is no longer subject to enforcement, monitoring, or self-monitoring, and the requirements it contains are no longer part of the Settlement Agreement. Since the Monitoring Team's last semi-annual compliance report, five discrete sections, covering 13 paragraphs, have been terminated.

Outcome Measurements

The Settlement Agreement calls on the Monitoring Team to conduct semi-annual qualitative and quantitative outcome assessments to measure whether implementation of the Agreement has created a series of intended outcomes. Building on the initial measurements we included in our last semi-annual report, the metrics analyzed in this report include those related to the City's systems for responding to persons in mental health crisis, its training for officers aimed at increasing the effective provision of services to such individuals, the proper management of PPB's uses of force, and the robustness of the City's systems of community engagement. Our reporting on these outcomes is based heavily on the set of data elements listed in the Agreement, which was provided

to us by PPB; it also includes data we gathered independently, in addition to our own observations, where appropriate. Our report describes in further detail how we conducted these measurements as well as what the data indicated.

Compliance Tracking Chart[3]

Settlement Agreement Paragraph	Compliance Assessment
Use of Force	
Use of Force Reporting Policy and Use of Force Report	
Paragraph 69	Substantial Compliance
Use of Force Supervisory Investigations and Reports	
Paragraph 70	Substantial Compliance
Paragraph 72	Substantial Compliance
Paragraph 73	Substantial Compliance
Compliance Audits Related to Use of Force	
Paragraph 74	Substantial Compliance
Paragraph 75	Substantial Compliance
Paragraph 76	Substantial Compliance
Paragraph 77	Substantial Compliance
Addendum of Additional Remedies	
Paragraph 188	Substantial Compliance
Paragraph 192	Substantial Compliance
Paragraph 194	Partial Compliance
Paragraph 195	Partial Compliance

[3] This chart includes the Settlement Agreement paragraphs subject to compliance assessment by the Monitoring Team during the Reporting Period. It does not include paragraphs subject to self-monitoring by the City; for more information about those paragraphs, see this report's Self-Monitoring Evaluation Chart.

Compliance Tracking Over Time[4]

Settlement Agreement Paragraph	Q1-Q2 2025 Compliance Assessment	Q3-Q4 2025 Compliance Assessment	Q1-Q2 2026 Compliance Assessment
Use of Force			
Use of Force Policy			
Paragraph 66	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 67	Moved into Self-Monitoring	Self-Monitored	Terminated
Use of Force Reporting Policy and Use of Force Report			
Paragraph 69	Substantial Compliance	Substantial Compliance	Substantial Compliance
Use of Force Supervisory Investigations and Reports			
Paragraph 70	Substantial Compliance	Substantial Compliance	Substantial Compliance
Paragraph 72	Substantial Compliance	Substantial Compliance	Substantial Compliance
Paragraph 73	Substantial Compliance	Partial Compliance	Substantial Compliance
Compliance Audits Related to Use of Force			
Paragraph 74	Substantial Compliance	Substantial Compliance	Substantial Compliance
Paragraph 75	Partial Compliance	Substantial Compliance	Substantial Compliance
Paragraph 76	Partial Compliance	Partial Compliance	Substantial Compliance
Paragraph 77	Substantial Compliance	Substantial Compliance	Substantial Compliance
Training			
Paragraph 78	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 79	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 81	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 84	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 85	Moved into Self-Monitoring	Self-Monitored	Self-Monitored
Paragraph 86	Moved into Self-Monitoring	Self-Monitored	Self-Monitored
Crisis Intervention			
BOEC			
Paragraph 115	Moved into Self-Monitoring	Self-Monitored	Terminated
Employee Information System			
Paragraph 116	Substantial Compliance	Substantial Compliance	Moved into Self-Monitoring
Paragraph 117	Substantial Compliance	Substantial Compliance	Moved into Self-Monitoring
Paragraph 118	Substantial Compliance	Substantial Compliance	Moved into Self-Monitoring
Officer Accountability			
Investigation Timeframe			
Paragraph 121	Moved into Self-Monitoring	Self-Monitored	Self-Monitored
Paragraph 122	Moved into Self-Monitoring	Self-Monitored	Self-Monitored
Paragraph 123	Moved into Self-Monitoring	Self-Monitored	Self-Monitored
On Scene Public Safety Statements and Interviews			
Paragraph 124	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 125	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 126	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 127	Moved into Self-Monitoring	Self-Monitored	Terminated
Conduct of IA Investigations			
Paragraph 128	Substantial Compliance	Moved into Self-Monitoring	Self-Monitored
Paragraph 129	Substantial Compliance	Moved into Self-Monitoring	Self-Monitored
Paragraph 131	Substantial Compliance	Moved into Self-Monitoring	Self-Monitored
Paragraph 132	Substantial Compliance	Moved into Self-Monitoring	Self-Monitored
Paragraph 133	Substantial Compliance	Moved into Self-Monitoring	Self-Monitored
Discipline			
Paragraph 137	Moved into Self-Monitoring	Self-Monitored	Terminated
Addendum of Additional Remedies			
Paragraph 188	Substantial Compliance	Substantial Compliance	Substantial Compliance
Paragraph 189	Substantial Compliance	Moved into Self-Monitoring	Self-Monitored
Paragraph 190	Moved into Self-Monitoring	Self-Monitored	Terminated
Paragraph 191	Substantial Compliance	Terminated	Terminated
Paragraph 192	Partial Compliance	Partial Compliance	Substantial Compliance
Paragraph 194	Partial Compliance	Partial Compliance	Partial Compliance
Paragraph 195	Partial Compliance	Partial Compliance	Partial Compliance

[4] This chart includes Settlement Agreement paragraphs subject to the Monitoring Team's compliance assessment at the start of our term. It does not include those subject to the City's self-monitoring at that time.

Compliance Assessments by Settlement Agreement Section

Use of Force

For the Monitoring Team's assessment of Settlement Agreement Paragraphs 69, 70, 72, and 73, we reviewed multiple PPB Directives related to the use of force by PPB officers in order to confirm their inclusion of the principles and requirements identified in this portion of the Settlement Agreement. We additionally reviewed PPB's After-Action Report (AAR) and any revisions made to it. Among the directives we reviewed were the following:

- 0910.00 Use of Force Reporting, Review, and Investigation
- 1010.00 Use of Force
- 1010.10 Deadly Force and In-Custody Death Reporting and Investigation Procedures

Additionally, in order to assess the consistent and verified performance of the principles and requirements referenced above by PPB officers in actual practice, the Monitoring Team reviewed a sample of use-of-non-deadly-force events that occurred during the Reporting Period as well as all use-of-deadly-force and in-custody death investigations that were completed during the period. Our sample consisted of 50 randomly selected use-of-non-deadly-force events from a total of 359 reported as having occurred, as well as the two use-of-deadly-force investigations and the two in-custody death investigations that were completed.

> **Note:** As described in more detail by Directive 1010.10 Deadly Force and In-Custody Death Reporting and Investigation Procedures: Deadly Force (also known as Lethal Force) includes any use of force likely to cause death or serious physical injury, including the use of a firearm, carotid neck hold, or strike to the head, neck or throat with a hard object; In-Custody Deaths occur when a subject dies while under physical control of a member (including through the use of a conducted electrical weapon system), dies as a direct result of police action, or dies while in police custody.

The Monitoring Team's sample of 50 use-of-non-deadly-force events included 38 classified as either Category II or Category III and twelve classified as De Minimis Force. Within the 38 Category II or III events from our sample, our review included all 20 that involved the use of force against a person with perceived or actual mental illness.[5] It is worth noting that each use of force event in our

[5] Only 19 Category II or III events from the Monitoring Team's sample were noted by PPB as involving force against a person with perceived or actual mental illness. Upon our review, one additional incident meeting this criterion was identified, thereby bringing the total number to 20. Significantly, the officers involved in the additional incident, as well as the reviewing chain of command, appropriately reported and reviewed it in

sample could potentially include more than one use of force; in all such instances, we separately assessed each use of force that occurred during the event.

> **Note:** As described in more detail by Directive 0910.00 Use of Force Reporting, Review, and Investigation: Category II cases include all member use of force resulting in serious physical injury, hospitalization, disability, or warranting an elevated review; Category III cases include all member use of force resulting in physical injury, less lethal weapon use without serious physical injury, and any other force that requires After-Action review; and De Minimis Force is defined as the minimally intrusive application of a restraint, (e.g., handcuffs or a hobble), or the use of an empty hand coercive technique to separate, guide and/or gain control of a subject, which is not readily capable of causing or reasonably likely to cause physical injury or persistent pain.[6]

> **Note:** Each case classified as Category II could potentially also include one or more Category III and De Minimis uses of force; each case classified as Category III could potentially also include one or more De Minimis uses of force. The twelve cases in our sample of 50 identified as De Minimis Force cases contained only De Minimis Force.

For the Monitoring Team's assessment of Settlement Agreement Paragraphs 74, 75, 76, and 77, we reviewed a series of materials prepared by the PPB Office of the Inspector General (OIG) covering this Reporting Period including the Applications of Force Report and Analysis, the Force Audit Report (FAR), the Non-Deadly Use of Force Findings Report, Force Inspector Dashboard and Analysis, Audit Methodologies, Precinct Alert Memos, Force Inspector Updates and Reminders, RU Review Force Alert Case Notes, Commendations, Sit-Along Schedules, Standard Operating Procedure (SOP) documents, and the quarterly and annual Force Analysis Summary Reports.

The FAR examines reports and investigations of uses of force by PPB officers, including chain of command reviews of AARs completed by supervisors following a use of force. In addition to reviewing that report and the multiple sources of data on which it is based, the Monitoring Team also conducted our own reviews in order to validate the report's results. These efforts put us in position to assess compliance with Paragraphs 74, 75, and 77. Each of those paragraphs lists numerous pieces of information to be addressed by, or standards of review to be incorporated into, the FAR, with PPB responsible for ensuring that they all are addressed or incorporated as appropriate.

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accordance with applicable policy; the absence of a notation regarding perceived or actual mental illness appears to be limited to a data error.

[6] Refer to PPB Directive 0910.00 Use of Force Reporting, Review, and Investigation for further details.

The Monitoring Team endeavored to complete a rigorous and thorough review of the FAR in order to comprehensively evaluate the multitude of data points and standards listed in Paragraphs 74, 75, and 77 (collectively). Guided by the language in those paragraphs, our review encompassed a total of 103 separate questions, which we applied to each case in a randomly-selected sample of 25 of the cases that had been audited by the OIG.[7] Our review was developed and conducted by multiple members of the Monitoring Team, allowing us to rely on a collective set of skills and expertise including civilian oversight of law enforcement, consent decree compliance, and criminal justice statistical analysis. Crucially, having more than one Monitoring Team member involved in different aspects of the review also helped us to ensure that we infused different perspectives into the assessments we made, as opposed to relying solely on a single person's experiences or point of view. Furthermore, we validated each finding in our own review that disagreed with a finding in the OIG's audit with a secondary reviewer in order to help confirm our accuracy with respect to those results.

Paragraph 69

Substantial Compliance

The Monitoring Team's review of PPB's use of force reporting directives confirmed the inclusion of requirements listed in Paragraph 69 of the Settlement Agreement. These include: 1) all officers who use force must draft timely use of force reports that include sufficient information to facilitate a thorough supervisory review; 2) all officers who are involved in, or witness to, a use of force must provide a full and candid account to supervisors; and 3) in case of an officer-involved shooting resulting in death, a use of lethal force, or an in-custody death, the reporting and review requirements specified in PPB Directive 1010.10 must be fulfilled.

The Monitoring Team's review of a sample of use of force events found that although a couple of issues warrant improvement, PPB successfully and consistently fulfilled an overwhelming majority of Paragraph 69's requirements in most instances. In all of the use-of-non-deadly-force events that we reviewed as part of our sample, the Monitoring Team found that officers completed use of force reports and/or General Offense (GO) reports in a timely manner, as required, and that those reports generally contained sufficient information to allow for a thorough supervisory review of the associated event. In all of the 38 Category II and Category III cases, officers who were involved in, or were witnesses to, a use of force appropriately provided full and candid accounts of the force event to a supervisor. Specifically in the twelve De Minimis Force cases we reviewed, we found that officers consistently completed supplemental reports documenting such

[7] The OIG provided the Monitoring Team with a population of 86 cases that it audited for the Force Audit Report covering this Reporting Period. Our sample comprised 29.1% of that population, and it included a review of 39 FDCRs, 25 AARs, and all associated case narrative documents.

uses of force whenever they were required to do so.[8] Officers also appropriately explained not only their own actions in De Minimis Force incidents that involved more than one officer, but also what they witnessed about the actions of other involved officers.

In addition to use-of-non-deadly-force cases, the Monitoring Team reviewed both use-of-deadly-force investigations as well as both in-custody death investigations that were completed during this Reporting Period. The reporting and review requirements arising out of a use of lethal force or an in-custody death, which are contained in PPB Directive 1010.10 Deadly Force and In-Custody Death Reporting and Investigation Procedures, are understandably numerous and extensive. Any loss of life related to law enforcement activity, or the realized potential for it, warrants the most rigorous and thorough levels of examination. For our review, the Monitoring Team looked at approximately 50 individual elements in each lethal force and in-custody death case in order to comprehensively assess compliance with Directive 1010.10.

More specifically, the Monitoring Team looked at adherence to multiple requirements in the areas of involved member responsibilities immediately following the event as well as after departure from the scene; witness member responsibilities immediately following the event as well as after departure from the scene; on-scene supervisor responsibilities in the aftermath of the event; notification protocols up the chain of command as well as to other City entities; Homicide Detective responsibilities; Professional Standards Division (PSD) responsibilities; Responsibility Unit (RU) Manager responsibilities; Training Division responsibilities; issuance of Communication Restriction Orders (CROs); and more. The Monitoring Team acknowledges the inherent complexity of all deadly force and in-custody death incidents as well as the subsequent investigations into them. Simultaneously, we recognize the criticality of meeting every requirement in PPB policy that applies to each use of lethal force or in-custody death, particularly given the impact that such critical incidents may have on those directly involved, the broader community, and PPB itself.

In the two use-of-deadly-force and two in-custody death investigations we reviewed, the involved officers met their various reporting requirements, as enumerated in PPB policy. These include making the initial notification(s) of their involvement in such an incident as soon as practicable, making it known to the on-scene supervisor that they are an involved member, and submitting to an audio-recorded interview with investigators. Similarly, witness officers met their respective reporting responsibilities in the investigations we reviewed, including notification of their involvement and role to the on-scene supervisor, conducting a scene walk-through, and providing a full and candid account of the use of force events as directed by detectives.

[8] PPB Directive 0910.00 Use of Force Reporting, Review, and Investigation indicates that, in cases where only De Minimis Force was used by a member, witness officers shall complete supplemental reports to document their observations only if "the member's actions result in an actual physical injury, or a complaint of pain or physical injury".

Following a use-of-deadly-force or an in-custody death, an on-scene supervisor is required to complete numerous tasks such as ensuring that medical aid is rendered as appropriate, locating and separating all involved and witness officers, admonishing those officers not to discuss the incident prior to the issuance of a CRO, obtaining Public Safety Statements (PSSs),[9] procuring any civilian witness information, and ensuring the delivery of notifications about the incident up the chain of command. Of the four such cases we reviewed for this Reporting Period, PPB supervisors successfully met these on-scene requirements in three of them. In the fourth, some issues arose due to a minor delay in recognizing that the incident qualified as an in-custody death.

The delayed recognition in that incident, in turn, resulted in the delayed separation and monitoring of involved and witness officers. It also resulted in a deviation from PPB policy with respect to applicable PSS requirements. When a supervisor is obtaining a PSS, PPB policy dictates that they are limited to a list of prescribed questions.[10] Because this incident was not promptly identified as an in-custody death, an involved officer provided an initial statement that exceeded the scope of that list.

The Monitoring Team's review of the incident determined that while the identified delay amounted to a deviation from Directive 1010.10 that should have been avoided, it was also rectified by PPB at the scene relatively quickly—within approximately 5-10 minutes. The required separation and monitoring of officers was completed, and the issues that led to the delay were addressed directly with the involved sergeants responsible for it.[11] Furthermore, appropriate recommendations were made by PPB as part of its review of this incident to minimize the risk of the same error reoccurring by incorporating guidance on in-custody death procedures into the Officer-Involved Shooting Checklist currently in use. While notable, the error identified in this instance was addressed by PPB at the scene, and it ultimately amounted to an exception to PPB's broader compliance, overall, with requirements for on-scene supervisors following lethal force and in-custody death incidents.

In further regard to PSSs, the Monitoring Team noted that the manner of their documentation by PPB was inconsistent from one case to another. In one deadly force incident we reviewed, the sergeant documented the obtained PSS in a supplemental report about the incident; in the other deadly force incident we reviewed, the PSS was documented within the Internal Affairs investigation that was later conducted into the incident. Additionally, in one of the in-custody death incidents we

[9] A Public Safety Statement consists of responses by a member to questions asked by an on-scene supervisor to elicit information necessary to protect life and/or ensure public safety. The questions may address, for instance, whether any rounds were shot from a firearm and, if so, in which direction; the location of any injured persons; and the direction of travel of any at-large suspects. On-scene supervisors are required to obtain this information from witness members and other sources; if they are unable to do so, they shall require involved members to provide a Public Safety Statement.

[10] Generally, this limitation is intended to protect the rights of the involved officer who, ostensibly, will also be the subject of any forthcoming investigation(s) into the associated incident.

[11] The Monitoring Team notes, however, that the involved officer's statement which exceeded the scope of a PSS—resulting from the delayed recognition of the incident as an in-custody death—was not specifically addressed by PPB.

reviewed, the responding sergeant indicated that no PSS was taken because no risk to the public was apparent. Although the sergeant was correct in their assessment that a PSS was unnecessary and not required under the circumstances, the proper justification for not obtaining one—pursuant to applicable PPB policy—is that the sergeant's own observations of the scene were sufficient to provide them with the required PSS information.

In addition to on-scene supervisors, PPB personnel from PSD and Detective Division each have a set of required responsibilities to complete as well in response to the use of deadly force. PSD is responsible for conducting an administrative investigation of the incident; Detective Division is responsible for conducting a criminal investigation of it. Requirements for PSD personnel include obtaining a compelled statement from the involved member after the provision of a *Garrity* warning,[12] audio-recording their interview with the involved member, conducting their administrative review concurrently with any criminal investigations, and, ultimately, determining whether member actions during the event were consistent with PPB policy. In the two use-of-deadly-force cases as well as the two in-custody death cases reviewed by the Monitoring Team, PSD personnel met all of these requirements.

As to the criminal investigation of use-of-deadly-force and in-custody death incidents, responding Detective Division personnel are required to, among other things, request a voluntary statement and on-scene walk-through from the involved member. If the member agrees, the responding detective must conduct complete and thorough interviews with that member to ensure that all applicable information is obtained. If the member declines, then the detective must not compel them to provide a statement or a walk-through. The detective must also direct any necessary witness officers to provide a walk-through. In the cases reviewed by the Monitoring Team for its assessment of PPB's compliance with these requirements, detectives consistently met them all.

One final set of policy requirements that the Monitoring Team noted in its review of two use-of-deadly-force and two in-custody death incidents must be fulfilled by PPB's Training Division and the Responsibility Unit (RU) Managers of involved members. Once the criminal investigation and administrative review of such incidents have been completed, Training Division is required to conduct its own review as well as an analysis of the investigative findings to determine whether members' actions were consistent with training and/or reflect any training deficiencies. These requirements were met in each of the use-of-deadly-force and in-custody death cases we reviewed for this Reporting Period. Subsequently, involved members' respective RU Managers are required to

[12] As defined in Directive 1010.10, a *Garrity* warning is an advisement given to a member who is the subject of an internal administrative investigation or review. A *Garrity* warning apprises the member that they are required to answer questions asked by Professional Standards Division investigators and are subject to discipline, up to and including termination, for failing or refusing to answer the questions. Directive 1010.10 further indicates that when a member involved in an incident governed by the directive is compelled to submit to an interview with PSD, any answers they provide after being issued a *Garrity* warning cannot be used against them in any criminal proceeding.

discuss the review completed by Training Division with those members. These discussions occurred, as required, in all four of the use-of-deadly-force and in-custody-death cases that we reviewed. In two of those cases, however, we noted that documentation of the discussions with one or more involved members appeared to have been delayed until after the end of the Reporting Period.

As indicated earlier, there are numerous requirements embedded in PPB policy that must be met in connection with every use of force by an officer – regardless of the category of force used. Although our review of a sample of use of force cases found a handful of deviations that reflect room for improvement, we also found that PPB consistently met a sizeable majority of the requirements, and that they did so with a high level of integrity. **We therefore conclude that the City is in Substantial Compliance with Paragraph 69 of the Settlement Agreement.**

Recommendations:

The Monitoring Team makes the following recommendation to support ongoing compliance with Paragraph 69 of the Settlement Agreement:

1. Ensuring the completion of all tasks required by policy in the aftermath of every deadly force and in-custody death incident is of paramount importance. Reinforce with supervisors the criticality of immediately recognizing when such incidents occur so that post-incident requirements requiring timeliness—including the identification, separation, and monitoring of involved officers—are not delayed, and so that other post-incident requirements—including obtaining Public Safety Statements—are completed in accordance with policy. Reinforce with RU Managers the need to timely document their discussions of Training Division's review of such incidents with involved members.

Based on the review we conducted for our assessment of compliance with Paragraph 69, the Monitoring Team makes the following additional recommendations, which are not required for compliance with the Settlement Agreement:

1. The Monitoring Team recommends that PPB refine its policy and training focused on ensuring the safety of restrained persons by further clarifying and emphasizing the importance of urgency on the part of officers. This recommendation is based on our review of one of the two in-custody death investigations completed during this Reporting Period; however, we believe that it potentially has implications for similar situations that could arise in the future. In particular, the positioning of restrained persons might have an impact on their physical well-being in certain circumstances. In light of this, and in conjunction with PPB's emphasis on the sanctity of life,[13] we believe its policy and training should more

[13] See Directive 1010.00 Use of Force for further details.

definitively address the crucial element of promptness in making sure that restrained persons are in an approved position.

With respect to policy, Section 5.1 of PPB Directive 0870.15 Use of Restraints for Custodies, Detentions, and Arrests states, "Members shall, when feasible, ensure restrained persons are in a standing, seated, or recovery position (lying on their side)." Although the directive does not define the term "feasible," it does reference two other PPB policies,[14] both of which define that term as, "When time and safety allow for a particular action." Specifically because the requirement in Section 5.1 of Directive 0870.15 is related to the safety of persons who have been restrained by PPB, we believe the presently designated level of urgency for fulfilling it should be heightened. We do not suggest that officers should be expected to take the action listed in that section—i.e. ensuring that a restrained person is in a standing, seated, or recovery position—at a time when it is not safe for them to do so. Rather, we suggest that the nexus between taking that action and minimizing the potential for negatively impacting the safety of restrained persons warrants a more exacting standard with respect to timeliness than the section currently delineates. As opposed to requiring officers to ensure that restrained persons are in a designated position "when feasible," PPB's policy could, for example, require them to ensure that this happens "immediately" once a person has been restrained, or "as soon as possible" thereafter.[15]

With respect to training, we acknowledge that PPB made efforts during this Reporting Period to incorporate into its online curriculum instruction regarding the "recovery position" as well as the prevention of positional asphyxia following a prolonged physical struggle. However, based on the reasoning that officers' actions in the field pursuant to Directive 0870.15 could have a direct and consequential impact on a subject's well-being, we believe further efforts are warranted. Ensuring that all officers operate with a clear and unequivocal understanding of how to most effectively and efficiently adhere to that directive's requirement regarding the positioning of restrained persons is of the utmost importance. Instruction on that requirement should, therefore, be incorporated into PPB's existing training on use of force and officer-involved shooting/in-custody death incidents. The instruction should be conducted in-person and include specific scenarios that approximate realistic circumstances encountered by officers, with a focus on assessing the situation, clarifying roles and responsibilities, and utilizing available resources (e.g. the number of officers at the scene) to ensure the timely fulfillment of the requirement.

[14] Directive 0850.21 Peace Officer Custody (Civil); and Directive 1015.00 Less Lethal Weapons and Tools.

[15] The Monitoring Team does not intend to suggest that these examples of potential wording are the only ones that would strengthen PPB policy in a manner consistent with this recommendation, although we do feel that they both signify improvement toward that objective.

In issuing this recommendation, we also acknowledge that PPB's investigation of the in-custody death incident that gave rise to it satisfied the requirements in Directive 1010.10 and, therefore, supported the City's overall demonstration of compliance with Paragraph 69 of the Settlement Agreement. As further detailed in our assessment above, this included, among other things: an administrative review to determine whether member actions were consistent with policy; presentation of the results of that review to the Police Review Board, which consists of both sworn and civilian members and issues recommended findings regarding all in-custody death incidents; and a review to determine whether involved member actions were consistent with training.

During our own review of the investigation into the incident, however, we noted that approximately four minutes appeared to elapse between the time when the subject was restrained with handcuffs and the time they were placed into a recovery position. This duration of time informed our consideration of whether refinements to applicable policy and training would be of benefit.[16] Although our assessment of compliance with Paragraph 69 is based (in part) on PPB's successful completion of the investigative process required for this incident, the review we conducted for that assessment identified an opportunity for organizational improvement in the form of more precise standards regarding the timely positioning of restrained persons. It is this opportunity for improvement in such a potentially consequential area that led us to make the suggestions contained in this recommendation.

2. The title of PPB Directive 1010.10 references both deadly force and in-custody deaths. The Monitoring Team's review of those incidents, when they occur, has led to our understanding that both types of incidents are subject to the requirements contained in the directive—as we believe they should be. However, the "Procedure" section of the policy, which enumerates the many requirements for involved members, witness members, on-scene supervisors, precinct or division commanders, homicide sergeants and detectives, PSD, and even the Chief of Police, focuses much more consistently on only deadly force incidents. In-custody deaths are specifically mentioned with respect to a few other aspects of Directive 1010.10;[17] but these instances prove to be exceptions to the rule that in-custody deaths are not explicitly referenced in nearly the entire set of numerous requirements that must be fulfilled by PPB members of various ranks, assignments, and levels of involvement every time they occur.

[16] We make no determination as to what impact, if any, the indicated duration of time had on the subject's physical well-being during this incident; we additionally make no determination as to the adjudication of the administrative investigation into the incident. Our recommendation is not intended to indicate otherwise.

[17] These mentions include a homicide detective's responsibilities to conduct an investigation of such incidents and to submit such cases to the District Attorney; in-custody deaths occurring outside of City limits or involving a peace officer from another jurisdiction; communications of members not involved in the associated incident; and the release of public information regarding the incident.

To maximize the accuracy, clarity, and intent of Directive 1010.10, and particularly in light of the deviations from that policy that we identified in our review of the in-custody death incidents that occurred during this Reporting Period, consider revising the directive to more explicitly and unequivocally reference in-custody deaths alongside uses of deadly force when enumerating any associated requirement that must be fulfilled by one or more PPB members.[18]

3. PPB Directive 0910.00 Use of Force Reporting, Review, and Investigation requires all officers who are involved in, or a witness to, a Category II or Category III use of force event to provide a full and candid account of the event to the supervisor at the scene. PPB Directive 0620.00 Body-Worn Camera Use and Management dictates that, in Category III events, the officers' accounts are not recorded on body-worn camera. In furtherance of transparency and accountability (with respect to assessing whether an officer's account is full and candid, as required), PPB should consider revising its policies to require that these officer statements regarding Category III events be recorded on body-worn camera, just as is the case with Category II events.[19]

4. Reinforce with supervisors all PPB requirements governing PSSs to minimize any potential for confusion regarding when and how they are required to be obtained, what sources they may be obtained from, and how to most effectively and consistently document their completion within the records of the associated incident. Related to the last point of emphasis in that list (documentation), we suggest requiring PSSs to be documented in a consistent manner in all cases in which they are obtained.

Paragraph 70

Substantial Compliance

The Monitoring Team's review of PPB's use of force directives confirmed their inclusion of requirements listed in Paragraph 70 of the Settlement Agreement. These requirements are for supervisors who receive notification of an event involving a use of force, and they include the following: 1) respond to the scene upon notification of a force event; 2) conduct an administrative review and investigation of the use of force; 3) document their findings in an AAR; 4) forward their report through the chain of command; 5) complete AARs within 72 hours of the force event; 6) immediately notify their shift supervisor and Professional Standards Division regarding all Serious

[18] After the close of the Reporting Period, the City indicated that Directive 1010.10 is under review and that the Monitoring Team's recommendation is under consideration.

[19] In its communications with the Monitoring Team after the close of the Reporting Period, the City stated that the implementation of this recommendation would require bargaining with affected labor unions.

Uses of Force,[20] any use of force against a person who has actual or perceived mental illness, and any suspected misconduct; notify Detective Division of any suspected criminal conduct; where there is no misconduct, determine whether additional training or counseling–to be provided by PPB consistent with the Settlement Agreement–is warranted; 7) where necessary, ensure the subject receives appropriate medical attention; and 8) interview officers individually and not in groups.

The Monitoring Team's assessment of a sample of Category II, Category III, and De Minimis use of force events, including the PPB reviews and investigations associated with them, confirmed the consistent and verified performance of these requirements by PPB officers in actual practice. In all 38 Category II or Category III use of force events reviewed by the Monitoring Team for its assessment of compliance with this paragraph, supervisors conducted an administrative review and investigation of the use of force, documented their findings in an AAR, forwarded the AAR through the chain of command, completed the AAR within 72 hours of the event, conducted involved or witness officer(s) interviews separately and not in groups, and ensured that persons upon whom force was used received medical attention when necessary. Supervisors additionally made proper notifications to PSD, as required, about any serious uses of force or any uses of force against persons who had actual or perceived mental illness, any alleged misconduct, and any other circumstances that require such a notification. Taken together, Paragraph 70 and PPB Directive 0910.00 (adherence to which is referenced in Paragraph 70) impose a significant number of important responsibilities on supervisors in response to a use of force. Our review found that PPB's supervisors fulfilled nearly all of these responsibilities, and that they did so nearly all of the time.[21]

[20] As defined in PPB Directive 0910.00, and as used in multiple places in this report, a "serious use of force" includes any of the following: 1) all uses of force by a member that reasonably appear to create or do create a substantial risk of death, serious disfigurement, disability, or impairment of the functioning of any body part or organ; 2) all critical firearm discharges by a member; 3) all uses of force by a member resulting in a significant injury, including a broken bone, an injury requiring hospitalization, or an injury deemed to be serious by a member's supervisor; 4) all head, neck, and throat strikes with an object or neck holds; 5) force used upon juveniles known or reasonably assumed to be under fifteen, or persons known or reasonably assumed to be pregnant; 6) all uses of force by a member resulting in a loss of consciousness; 7) more than two applications of a Conducted Electrical Weapon (CEW) on a person during a single interaction, regardless of the mode or duration of the application, regardless of whether the applications are by the same or different officers, and regardless of whether the CEW application is longer than 15 seconds, whether continuous or consecutive; 8) any strike, blow, kick, CEW application, or similar use of force against a handcuffed, otherwise restrained, under control, or in custody subject, with or without injury; 9) any use of force referred by a member's supervisor to Professional Standards Division which that division deems a serious use of force.

[21] There was one use of force event during which the supervisor who had been notified did not respond to the use of force scene. This event occurred during an active public order incident, which resulted in a deployment of PPB's Rapid Response Team (RRT). The supervisor furnished an explanation of the extraordinary circumstances justifying their decision not to respond to the use of force scene, which the Monitoring Team found to be in accordance with PPB policy.

In the twelve De Minimis Force cases reviewed by the Monitoring Team for its assessment of compliance with this paragraph, supervisors reviewed and approved officers' General Offense (GO) and Supplemental reports about the force that was used, as required, in all but one case (91.7% +/- 15.0%). That exception involved an incident concerning a minor.[22] PPB Directive 0910.00 provides that force used upon juveniles known or reasonably assumed to be under fifteen is considered a Serious Use of Force; and that force used upon children under the age of fifteen is considered a Category II use of force. Accordingly, the classification of this matter as a De Minimis use of force was inconsistent with current policy.

In all of the De Minimis Force cases in the Monitoring Team's sample in which the individual upon whom force was used complained of pain, the individual's complaint was entered into the member's Employee Information System (EIS) Performance Discussion Tracker (PDT). Three of the cases gave rise to the requirement that a supervisor notify PSD and their shift supervisor of a use of force against a person with actual or perceived mental illness, and the required notifications were made in each of these cases. Finally, in four De Minimis Force cases, an individual was arrested for either Resisting Arrest or Assault of a Public Safety Officer. However, the reviewing supervisor in only one of those cases (25.0% +/- 42.4%) reviewed relevant body-worn camera video of the incident, as required.

Although the Monitoring Team's review of a sample of use of force cases identified a small number of deviations from the requirements implicated by Paragraph 70, these deviations were exceptions to a broader determination that PPB consistently fulfilled nearly all of the requirements and did so with a high level of integrity. Notably, our review also found that PPB made clear improvements from the previous Reporting Period with respect to required notifications to PSD and the chain of command of any De Minimis uses of force upon persons who had actual or perceived mental illness. **We therefore conclude that the City is in Substantial Compliance with Paragraph 70 of the Settlement Agreement.**

Recommendations:

The Monitoring Team makes the following recommendations to support ongoing compliance with Paragraph 70 of the Settlement Agreement:

1. Refresh supervisors' understanding of the circumstances that constitute a Serious Use of Force as well as the actions they are required to take in response to one.

2. Refresh supervisors' understanding of their requirements, pursuant to Directive 0910.00, in response to all De Minimis uses of force. This includes, but is not limited to, reviewing BWC recordings in certain circumstances.

[22] The minor involved in this incident was 11 years of age when the incident occurred.

Paragraph 72

Substantial Compliance

For the Monitoring Team's assessment of Settlement Agreement Paragraph 72, we reviewed PPB's After-Action Report (AAR), which PPB utilizes as a checklist to be completed by supervisors who are responsible for conducting a Category II or Category III use of force investigation. PPB did not make any revisions to its AAR during this reporting period. **The Monitoring Team's review of the AAR confirmed that, overall, it is an appropriate effort to ensure that supervisors fully perform their force investigation responsibilities pursuant to Directive 0910.00 Use of Force Reporting, Review, and Investigation.**

Supervisors' responsibilities following a Category II or Category III use of force include conducting an administrative review and investigation of the use of force, documenting their findings, forwarding their report through the chain of command, completing the AAR within 72 hours of the force event, making appropriate notifications regarding a serious use of force or a use of force against a person with a perceived or actual mental illness, ensuring that subjects receive medical attention when necessary, and interviewing officers individually and not in groups. The AAR is appropriately designed to require a supervisor to address each of these responsibilities.

However, as previously pointed out in each of our last two semi-annual compliance reports (covering the Reporting Period of Q1-Q4 2025, collectively), the Monitoring Team notes that the AAR form does not account for a supervisor's responsibility to respond to the scene of a use of force incident. Although such a response may commonly be inferred from other aspects of the use of force investigation, we continue to believe that this supervisorial responsibility should be explicitly added to those that comprise the AAR's existing checklist, as is the case with all of the other responsibilities referenced above.

Apart from this minor exception, which we believe calls for a relatively simple resolution, we find that PPB has satisfied the requirements of this paragraph in a comprehensive fashion and with a high level of integrity. **We therefore conclude that PPB is in Substantial Compliance with Paragraph 72 of the Settlement Agreement.**

Recommendations:

The Monitoring Team makes the following recommendation to support ongoing compliance with Paragraph 72 of the Settlement Agreement:

1. Include within the AAR form the requirement for supervisors to verify their response to the scene of a use of force incident.

Based on the review we conducted for our assessment of compliance with Paragraph 72, the Monitoring Team makes the following additional recommendation, which is not required for compliance with the Settlement Agreement:

1. The following supervisorial responsibilities related to the use of force are presently listed in Directive 0620.00 Body-Worn Camera Use and Management: 1) obtain a full and candid account—recorded on a BWC—from involved and witness members for Category II uses of force; and 2) review BWC footage as part of their investigation of Category II and Category III uses of force. As ensuring that these responsibilities are met is as important as ensuring those in Directive 0910.00 are met, we recommend updating the AAR form to account for them as well.

Paragraph 73

Substantial Compliance

The Monitoring Team's review of PPB's use of force reporting directives confirmed their inclusion of the requirements listed in Paragraph 73 of the Settlement Agreement. These include: 1) the Employee Information System tracks all use of force investigation findings and corrections; 2) all supervisors in the chain of command are subject to and receive corrective action or discipline for the accuracy and completeness of AARs completed by supervisors under their command; 3) all supervisors in the chain of command are accountable for inadequate reports and analysis; 4) supervisors receive the appropriate corrective action when they repeatedly conduct deficient investigations, and shift or precinct commanders receive the appropriate corrective action when they repeatedly permit deficient investigations; 5) PPB takes appropriate corrective action consistent with the Accountability provisions of the Settlement Agreement when a use of force is found to be out of policy; 6) where a use of force indicates policy, training, tactical, or equipment concerns, the immediate supervisor shall notify the Inspector and the Chief, who shall ensure PPB timely addresses all such concerns; and 7) the Chief (or their designee) and Professional Standards Division have discretion to reassign a use of force investigation to Detective Division or any supervisor.

The Monitoring Team's review of a sample of Category II and Category III use of force events and investigations confirmed the consistent and verified performance of a large majority of these requirements in actual practice, with some minor or occasional exceptions. Of the Monitoring Team's sample of 38 Category II and III use of force cases, PPB tracked all findings in the Employee Information System (EIS). There were twenty identified supervisory chain of command corrections that warranted documentation and tracking in the EIS. Fifteen of them

included the required EIS documentation, while the remaining five (25% ± 19.0%) did not.[23] The Monitoring Team notes that this EIS documentation rate is markedly improved in comparison with the rate during the previous Reporting Period (Q3-Q4 2025);[24] we also note that further room for improvement remains.

The Settlement Agreement and PPB policy require supervisors to complete multiple on-scene responsibilities needed to produce an accurate and comprehensive supervisory AAR. These responsibilities include, but are not limited to, responding to the scene, ensuring medical attention is provided when necessary, gathering applicable evidence, such as conducting separate interviews with the involved and witness officers, interviewing the person on whom force was used, ensuring photographs are taken, and obtaining any civilian witness statements. In two of the Category II or III use of force cases out of the Monitor's sample of 38 such cases, a supervisor warranted corrective action or discipline as a result of producing an inaccurate and/or incomplete AAR. Remediation occurred in each of those cases and was appropriately documented by PPB, as required.

The Monitoring Team concurred with the analyses of Category II and III use of force incidents from our sample that were conducted by supervisors in the chain of command with respect to whether the force they reviewed comported with PPB policy. We noted that one of those incidents (2.6% +/- 5.1%) also included an application of De Minimis Force, which was not reported and reviewed in accordance with PPB policy. There were no cases in our sample in which the Chief or a designee reassigned a use of force investigation to the Detective Division or any PPB Supervisor.

In six of the cases the Monitoring Team reviewed, a supervisor or member of the chain of command indicated a policy, tactical, training, or equipment concern. More specifically, five training concerns and one equipment concern were raised. Upon reviewing PPB's "Inspector Feedback Loop," which is intended to document the handling of these concerns as required by Paragraph 73.f., all five of the training recommendations were included; however, the one equipment recommendation was not included in the document (16.7% +/- 30.0%).

The Monitoring Team's assessment of compliance with the requirements in this paragraph of the Settlement Agreement includes a check on fourteen individual elements for each Category II or III use of force case in our sample. We found that PPB successfully met most of the requirements in

[23] In September 2026, the City provided the Monitoring Team with PDT entries it had made, after the end of the Reporting Period, in four of the five cases. With respect to the fifth case, the City indicated that one officer for whom a PDT entry was required had separated from PPB (no information was provided regarding when that separation occurred, however). The City further indicated that an identified issue involving a second officer in that case was better addressed through a discussion of best practices than through a chain of command correction; and that the matter, therefore, did not require a PDT entry. The Monitoring Team believes that correction of the matter was indeed warranted, and that a PDT entry should therefore have been completed.

[24] The same documentation rate during the last Reporting Period was below 50%.

most of those cases, and that the limited deviations we identified were not systemic in nature. **We therefore conclude that the City is in Substantial Compliance with Paragraph 73 of the Settlement Agreement.**

Recommendations:

The Monitoring Team makes the following recommendation to support ongoing compliance with Paragraph 73 of the Settlement Agreement:

1. PPB should enhance its efforts to ensure that supervisors and reviewing chains of command are properly documenting identified and completed corrective actions in EIS. Enhancing these efforts could involve, among other things, reminder training of this responsibility for all supervisors in a position to conduct chain of command reviews of AARs, and, subsequently, a requirement that they acknowledge their understanding of it.

Paragraph 74
Substantial Compliance

As part of PPB's quarterly review of force, PPB's Force Inspector is required to audit force reports and Directive 0910.00 Investigation Reports in order to ensure that a number of requirements related to PPB's use of force and reporting of force are being met. **The Monitoring Team's review confirmed the consistent and verified performance of these requirements by the PPB Force Inspector in actual practice.**

The purpose of the audit is to ensure: 1) that force is used and reported appropriately; 2) that Electronic Control Weapons (ECWs) are used in compliance with PPB policy and that ECW usage is reported properly; and 3) that reports are completed in a timely manner, with detailed descriptions of the incident and the decision-making process used by officers as it relates to force (e.g. the level of resistance encountered, the number and types of uses of force, any complaints of injury or apparent injury to the subject, any medical care provided, the use of de-escalation techniques, and efforts to identify witnesses to the use of force).[25]

As the Monitoring Team noted in its previous compliance report (covering the Reporting Period from Q3-Q4 2025), PPB's audit methodology only identifies deficiencies in the Use of Force Reporting process, as opposed to both identifying such deficiencies and giving a clear accounting of what was reported in any non-deficient reports. For example, the methodology frequently combines non-deficient outcomes for a particular data element together under a single answer value, making it

[25] The Force Inspector's audit of force reports and Directive 0910.00 Investigation Reports covers Category II and III uses of force during the Reporting Period; Category I uses of force and uses of only De Minimis force are not covered.

more difficult to validate individual audit elements than in the past. For our review of PPB's audit of force reports, the Monitoring Team assessed a sample of cases from the audit utilizing the same standardized evaluation instrument as it had during the last Reporting Period.

The Monitoring Team sampled 25 of the cases that were audited by the PPB Force Inspector pursuant to Paragraph 74. The 25 case numbers in our sample were associated with a total of 39 Force Data Collection Reports (FDCRs). For each of the sampled cases, we requested: 1) the FDCRs completed by PPB members; 2) the use of force AARs completed by PPB supervisors; 3) all narrative reports of the event and Computer Aided Dispatch reports; and 4) the results obtained by PPB during its audit of the force reports. We then reviewed the force reports, following PPB's audit methodology, and compared the results obtained from our review to those obtained by PPB. We recorded any instance in which the findings of our review disagreed with the findings in PPB's audit.

Our review of the Force Audit Report for Paragraph 74 sought to evaluate 44 specific elements across each of the 39 FDCRs from our sample. In other words, our assessment of PPB's compliance with this paragraph included an examination of 1,716 points. Our findings showed at least one disagreement with those of the OIG in 23.1 percent of the FDCRs we reviewed; however, an aggregate look across all elements from those FDCRs resulted in a 99.3 percent rate of agreement with the OIG. This reflects a substantial decrease in the number of disagreements we had with the findings of the OIG when compared with the previous Reporting Period (Q3-Q4 2025), when we identified at least one disagreement in 60 percent of the FDCRs that we reviewed. **In sum, our review of PPB's Force Audit findings indicates substantial agreement between the content of reports and the audit results in nearly all the cases we reviewed.**

In connecting our findings directly to the Settlement Agreement, the Monitoring Team found that PPB's audit results for all six requirements listed in Paragraph 74.a. (with respect to the use of force) agreed with our findings in more than 90 percent of cases. PPB's audit results for all four requirements listed in Paragraph 74.b. (with respect to ECW usage) were in 100 percent agreement with our findings. Additionally, PPB's audit results for all 11 requirements listed in Paragraph 74.c. (with respect to use of force reporting) agreed with our findings in more than 90 percent of cases.

Thus, the Monitoring Team agreed with a sizeable majority of the findings in PPB's Force Audit Report with regard to the requirements for that report that are listed throughout Paragraph 74. Furthermore, those discrepancies that exist appear to be no more than occasional in their frequency and not systemic in terms of their impact on the entire audit report. **We therefore conclude that the City is in Substantial Compliance with Paragraph 74 of the Settlement Agreement.**

Recommendations:

Based on the review we conducted for our assessment of compliance with Paragraph 74, the Monitoring Team makes the following recommendation, which is not required for compliance with the Settlement Agreement:

1. The Monitoring Team found that PPB's Audit Methodology, while capable of identifying force reporting deficiencies, does not appear to provide PPB with clear data about specific details of audited force events, which could prove useful for future quality improvement efforts. Moreover, it appears that the language found in the questions and their corresponding answer choices no longer align. Therefore, the Monitoring Team recommends that PPB revise its current Audit Methodology to ensure it allows for the clearest and most accurate accounting of the use of force reporting process; doing so would subsequently allow PPB to target for improvement individual audit elements that have identified deficiencies, or to identify other quality improvements with respect to use of force reporting.

Paragraph 75
Substantial Compliance

The PPB Force Inspector is required to audit force reports and Directive 0910.00 investigations to determine whether supervisors consistently meet a set of requirements that arise after a use of force occurs. **The Monitoring Team's review confirmed the consistent and verified performance of this requirement by the PPB Force Inspector in actual practice.**

The supervisory requirements subject to the Force Inspector's audit include: 1) completing an AAR within 72 hours of notification of a use of force; 2) reviewing all use of force reports to ensure they include the information required by the Settlement Agreement and PPB policy; 3) evaluating the weight of the evidence; 4) using a "decision-point" approach to analyze each use of force; 5) determining whether actions of the officer who used force appear consistent with PPB policy, the Settlement Agreement, and best practices; 6) determining whether there was legal justification for the original stop and/or detention; 7) assessing the incident for tactical and training implications, including whether the use of force may have been avoided through the use of de-escalation techniques or lesser force options; 8) determining whether additional training or counseling is warranted; 9) implementing corrective action wherever there are material omissions or inaccuracies in officers' use of force reports, and for failing to report a use of force, whether applied or observed; 10) documenting any non-disciplinary corrective action to remedy training deficiencies, policy deficiencies, or poor tactical decisions in the Employee Information System; 11) notifying Professional Standards Division and the shift supervisor of every incident involving an officer's serious use of force, as well as any use of force that could appear to a reasonable supervisor to

constitute misconduct; and 12) notifying Detective Division and the shift supervisor of every force incident in which it could reasonably appear to a supervisor that an officer engaged in criminal conduct.

The Monitoring Team's review of a sample of 25 cases audited by PPB exhibited more than 90 percent agreement with the audit's findings across all twelve of the requirements listed in Paragraph 75. Furthermore, the discrepancies that do exist appear to be no more than occasional in their frequency, and they are not systemic in terms of their impact on the entire audit report. **We therefore conclude that the City is in Substantial Compliance with Paragraph 75 of the Settlement Agreement.**

Recommendations:

Based on the review we conducted for our assessment of compliance with Paragraph 75, the Monitoring Team makes the following recommendation, which is not required for compliance with the Settlement Agreement:

1. The Monitoring Team found that PPB's Audit Methodology, while capable of identifying force reporting deficiencies, does not appear to provide PPB with clear data about specific details of audited force events, which could prove useful for future quality improvement efforts. Moreover, it appears that the language found in the questions and their corresponding answer choices no longer align. Therefore, the Monitoring Team recommends that PPB revise its current Audit Methodology to ensure it allows for the clearest and most accurate accounting of the use of force reporting process; doing so would subsequently allow PPB to target for improvement individual audit elements that have identified deficiencies, or to identify other quality improvements with respect to use of force reporting.[26]

Paragraph 76

Substantial Compliance

This paragraph of the Settlement Agreement requires the PPB Force Inspector to conduct analysis of force data and supervisors' Directive 0910.00 reports designed to accomplish several objectives. The Monitoring Team reviewed a series of reports produced by PPB related to the analysis that this paragraph requires. **Our review of these reports and their respective analyses found that they are appropriately designed to accomplish the outcomes listed in Paragraph 76.**

[26] For further information regarding the observation of the Monitoring Team that led to this recommendation, see our assessment of the City's compliance with Paragraph 74.

The documents reviewed by the Monitoring Team included:

- Applications of Force Report (Q1-Q2 2026)
- Force Inspector Dashboard (Q1-Q2 2026)
- Force Analysis Quarterly Summary Report (Q1-Q2 2026)
- Force Audit Report (Q1-Q2 2026)
- Non-Deadly Use of Force Findings Report (Q3-Q4 2025)[27]
- Analysis of Applications of Force Report and Inspector Dashboard Spreadsheets (Q1 2026)
- Applications of Force Analysis (Q2 2026)
- Force Audit Review Memos for North, Central, and East Precincts (Q4 2025-Q1 2025)[28]
- Sit-Along Schedule for OIG and North, Central, and East Precincts (Q1-Q2 2026)
- Commendation Samples (Q1-Q2 2026)
- Force Inspector Updates and Reminders (Q1-Q2 2026)
- Responsibility Unit (RU) Review Force Alert Case Notes (Q1-Q2 2026)

The complete list of objectives in Paragraph 76 includes: 1) determining whether significant trends exist; 2) determining if there is variation in force practice away from PPB policy in any unit; 3) determining if any officer, PPB unit, or group of officers is using force differently or at a different rate than others, determining the reason for any difference, and correcting or duplicating the difference elsewhere, as appropriate; 4) identifying and correcting deficiencies revealed by the analysis; and 5) documenting the Force Inspector's findings in an annual public report.

Determining if Significant Trends Exist

Paragraph 76.a. asks whether significant trends exist, although it does not define metrics for which trends should be established nor specify a time period of review. It also does not differentiate whether trends should be statistically significant using standard analytical significance testing techniques, or whether they should be practically significant in terms of exhibiting a meaningful and non-trivial change over time. Finally, Paragraph 76.a. does not differentiate between determining directionality only (i.e. either increasing or decreasing) or a direction and magnitude of change (e.g. a 10% increase or a 10% decrease). Absent such specifications, the Monitoring Team reviewed all

[27] The Non-Deadly Use of Force Findings Report requires PPB to perform its routine force auditing process, followed by additional analyses to identify officers who may require further discussion or other intervention, as well as the required review and follow-ups by supervisors and command staff. Because of this, the report cannot be generated on the same reporting schedule as the compliance assessment Reporting Period. Therefore, our report includes data from the prior Reporting Period.

[28] The Force Audit Review Memos require analysis by PPB to identify officers who may warrant further discussion or other intervention. Because of this, they cannot be generated on the same reporting schedule as the compliance assessment Reporting Period. Therefore, our report includes data from the part of the prior Reporting Period in addition to part of this one.

documents and analyses provided by PPB to determine whether they assess trends in data on the whole.

In the Force Analysis Summary Reports, the trends described by PPB represent the change by quarter over the past year. While a longer comparison would be more beneficial, having four time points can still allow for a meaningful understanding of the data. In the Force Audit Report, the trends described by PPB represent the change from a prior quarter to the current quarter, reflecting the simple change between two time points. These analyses can help PPB better understand its use of force data and supervisors' Directive 0910.00 reports. While none of the analyses used statistical testing to assess significant trends, they are meaningful and informative nonetheless, and they fulfill the requirements in Paragraph 76.a.

Determining if there is Variation in Force Practice Away from PPB Policy in any Unit

The documentation provided by PPB in support of compliance with Paragraph 76.b. includes four discussions of force practice away from policy. The quarterly Force Analysis Summary Reports for Q1 and Q2 2026 each include a list of out-of-policy findings reached by PPB regarding members' uses of force. In Q1 2026, there was one officer whom PPB found had used out-of-policy force against a subject, while in Q2 2026, there were three such officers. Of the four out-of-policy findings in total during the Reporting Period, two were attributed to East Precinct, one to North Precinct, and one to Central Precinct. Three of the officers to whom these findings were attributed had used a Conducted Electrical Weapon (CEW) and the fourth had deployed a takedown. As evidenced by these reports, PPB is reporting on variations in force practice away from policy by unit and meeting the requirements in Paragraph 76.b.

Determining if any Officer, PPB Unit, or Group of Officers is Using Force Differently or at a Different Rate than Others, Determining the Reason for any Difference, and Correcting or Duplicating Elsewhere, as Appropriate

Paragraph 76.c. lists three specific objectives for the Force Inspector's analysis. First, it must determine whether any officer, unit, or group of officers is using force differently or at a different rate than others. Second, it must determine the reasons for any differences. Third, it must correct or duplicate those differences elsewhere, as appropriate.

PPB's Applications of Force Report compares the performance of individual officers against the averages and standard deviations of their units. It also provides averages and standard deviations that can be compared across units and shifts. The Quarterly Force Summary Reports also compare PPB force applications by precinct and provide additional context behind these applications. Finally, the Analysis of Applications of Force Report and Inspector Dashboard Spreadsheets prepared by the OIG provide analyses on officers who have FDCR to Custody Ratios greater than or equal to 25 percent, who rank among the Top 10 Calls for Service, Top 10 Arrests, or Top 10 Force

Applications, and who have higher counts or ratios than their peers. OIG also considers the force history of identified officers to understand any emerging patterns or trends. In the Force Audit Review Memos for North, Central, and East Precincts, there is a section on Use of Force Ratios and Applications in which the Force Inspector identifies specific officers based on their higher force ratios and provides an explanation for such differences.

The RU Review Force Alert Case Notes provided by PPB contained a sample of supervisor reviews for 10 force-related threshold alerts triggered in the Employee Information System (EIS). The notes document the review process initiated once the EIS alert is triggered, starting with an assessment by the EIS Administrator, followed by transmittal to the subject member's RU manager and, subsequently, their primary supervisor, and then returning to the RU Manager for a recommendation. Throughout this process, PPB supervisors review use of force reports and the subject member's data in EIS—including the performance data tracker and alert management system for historical performance; they also discuss member performance with other supervisors and review other relevant information as deemed appropriate. In many cases, the member's performance is reviewed directly with the member as well. Furthermore, supervisors and RU managers document any proposed interventions, such as coaching discussions, 30/60/90-day monitoring protocols, referrals to the Employee Assistance Program (EAP), changes of assignments, or transfers. These notes demonstrate the multiple layers of review that occur in response to EIS force-related alerts in order to determine whether PPB members are at risk for potentially problematic trends in performance.

Finally, PPB also provided five samples of commendations issued to officers. In consultation with PPB, the Monitoring Team learned that such commendations are shared with its members (beyond only the member who is the subject/recipient of the commendation) as a way of highlighting good performance and attempting to duplicate it amongst other officers and in other units. In sum, PPB demonstrated that it is reporting on differences in uses of force and the reasons for these differences, documenting its review process, and correcting or duplicating differences elsewhere, as appropriate. It is therefore meeting the requirements of Paragraph 76.c.

Identifying and Correcting Deficiencies Revealed by the Analysis

PPB's Non-Deadly Use of Force Report provides data from a combination of the Force Audit Report and the Applications of Force Report. The Non-Deadly Use of Force Report describes the extent to which PPB members accurately completed the required data elements in the use of force reporting and supervisory/chain of command review process. As PPB notes in the Operational Definitions section of the report, "The force audit results are based on the entire force reporting and review process meaning that if a member in the command review addressed a member's reporting and/or review deficiency, the member is no longer found deficient." The practical implication of this approach is that the audited compliance percentages reported by rank are higher than they would be if one were to tabulate the actual number of deficiencies identified among members at

each rank. This is because the compliance percentages do not account for deficiencies caught by other members during the supervisor review process.

For example, after sergeants, lieutenants, and Reporting Unit managers reviewed Central Precinct officers' use of force reports and corrected any deficiencies found, no further deficiencies were identified during the audit, resulting in a finding of 100% compliance. It is unknown to the Monitoring Team how many deficiencies Central Precinct officers' use of force reports exhibited prior to the supervisor review process. We identified the same concern with this aspect of PPB's reporting methodology in a prior Reporting Period, noting that it does not allow for the accurate or reliable measurement of force reporting compliance for specific ranks. However, we acknowledge that this approach does still allow PPB to estimate the percentage of force events in which there were deficiencies remaining after all reviews of such events that are required by policy had been completed. Thus, the compliance percentages contained in the Non-Deadly Use of Force Report must be interpreted as findings for the entirety of the PPB force reporting review process.

The Non-Deadly Use of Force Findings Report also includes the criteria defined in Standard Operating Procedure (SOP) #5: Force Analysis for Supervisors and Teams, which is designed to identify at-risk RUs, shifts, details, and supervisors based on trends in the use of force. By combining this SOP with the Applications of Force Report and Inspector Dashboard spreadsheets, as well as with the EIS Precinct Memos, PPB is able to demonstrate its utilization of a criteria-based system to identify at-risk members and document how supervisors determine whether to respond with some form of intervention. Furthermore, the RU Review Force Alert Case Notes often indicate that a supervisor had a discussion with the subject member, and they document the final rationale for any interventions put in place. The notes provided by PPB included some alert review processes that resulted in action to correct deficiencies and others for which it was determined that no further action was necessary.

Finally, PPB provided documentation of their OIG Sit-Along meetings. During a Sit-Along, OIG staff meet with PPB sergeants to review the Force Audit process and applicable Settlement Agreement requirements, and to clarify what represents a deficiency when supervisors are completing force investigations and After-Action Reports. OIG staff members discuss their audit methodology and provide examples of both compliant and deficient reporting in an effort to show supervisors how to improve their own investigations and reporting. PPB provided the Monitoring Team with the Sit-Along checklist of topics to be discussed as well as the schedule of Sit-Along meetings that occurred during the Reporting Period. The Monitoring Team acknowledges the importance of this kind of feedback loop that uses metrics obtained from OIG's audit to improve front-line performance on the part of supervisors.

Despite the Monitoring Team's maintained concern specifically regarding PPB's process for compiling its Non-Deadly Use of Force Report, the overall collection of materials we were provided by PPB demonstrate that it has processes in place to identify deficient behavior related to the use of

force—including with respect to force reporting—and that it also has processes in place to address the deficiencies. As such, PPB is fulfilling the requirements of Paragraph 76.d.

Documenting the Inspector's Findings in an Annual Public Report

The Force Inspector's Annual Force Analysis Summary Report for 2025 was posted online in February 2026, as was the Non-Deadly Use of Force Findings Report covering Q3 and Q4 2025. These two reports were provided by PPB to demonstrate compliance with Paragraph 76's requirement to document the Force Inspector's findings—arrived at pursuant to the other requirements in this paragraph—in an annual public report. The reports address some, though not all, of the findings required by Paragraph 76, including trend analyses consistent with the quarterly Force Analysis Summary Reports across 2023, 2024, and 2025; identification of force practice away from PPB policy; identification of differential force used across PPB officers and units; and limited information regarding the identification and correction of member performance. PPB is therefore meeting part of the requirement in Paragraph 76.e.

Although not all of the findings reached by the numerous analyses conducted pursuant to Paragraph 76 are reported publicly by PPB, a significant number of them are. Insofar as the absence of some others amounts to a deviation from this paragraph's requirements, the Monitoring Team does not consider the deviation to be a major one.

The sizeable combination of reports and analyses reviewed by the Monitoring Team for its assessment of PPB's compliance with Paragraph 76 of the Settlement Agreement collectively illustrates that PPB is fulfilling the requirements in that paragraph comprehensively, with only minor deviations. We therefore conclude that PPB is in Substantial Compliance with Paragraph 76 of the Settlement Agreement.

Recommendations:

The Monitoring Team makes the following recommendations to support ongoing compliance with Paragraph 76 of the Settlement Agreement:

1. To optimize the effectiveness of the analysis required by Paragraph 76, consider broadening the standard used by the Force Inspector and RU Managers to determine which findings should result in some measure of intervention and/or other follow-up action with the subject member. Even in some cases where an articulable explanation for a deviation in use of force data is identified, efforts to discuss the deviation can provide valuable learning opportunities and, potentially, minimize the chance of future deviations.

2. Provide more comprehensive documentation in an annual report of the Force Inspector's findings from the numerous analyses that are performed pursuant to the requirements in Paragraph 76.

Paragraph 77
Substantial Compliance

The PPB Force Inspector is required to audit chain of command reviews of AARs to determine whether all supervisors in the chain of command consistently met their review requirements subsequent to a use of force. **The Monitoring Team's review confirmed the consistent and verified performance of this requirement by the PPB Force Inspector in actual practice.** The chain of command requirements subject to the Force Inspector's audit include: 1) reviewing supervisors' findings about the use of force, as are required by PPB Directive 0910.00, using a preponderance of the evidence standard; 2) reviewing reports on the use of force, as are required by PPB Directive 0910.00, to ensure completeness, and ordering additional investigation when necessary; 3) modifying findings as appropriate, and documenting modifications; 4) ordering additional investigation when it appears that there is additional relevant evidence that may assist in resolving inconsistencies or improving the reliability or credibility of the findings, and counseling the investigator; 5) documenting any training deficiencies, policy deficiencies, or poor tactical decisions, ensuring a supervisor discusses poor tactical decisions with the officer, and ensuring the discussion is documented in the Employee Information System; 6) suspending an investigation immediately and notifying the branch Assistant Chief, Director of Professional Standards Division, and Detective Division whenever the investigating supervisor, shift commander, or division commander finds evidence of apparent criminal conduct by a PPB officer; and 7) reporting a matter to Professional Standards Division for review and investigation whenever an investigating supervisor, shift commander, or precinct commander finds evidence of apparent misconduct by a PPB officer or employee.

The Monitoring Team's review of a sample of 25 cases audited by PPB exhibited more than 90 percent agreement with the audit's findings across all seven of the requirements listed in Paragraph 77. Furthermore, the discrepancies that do exist appear to be no more than occasional in their frequency, and they are not systemic in terms of their impact on the entire audit report. **We therefore conclude that the City is in Substantial Compliance with Paragraph 77 of the Settlement Agreement.**

Recommendations:

Based on the review we conducted for our assessment of compliance with Paragraph 77, the Monitoring Team makes the following recommendation, which is not required for compliance with the Settlement Agreement:

1. The Monitoring Team found that PPB's Audit Methodology, while capable of identifying force reporting deficiencies, does not appear to provide PPB with clear data about specific details of audited force events, which could prove useful for future quality improvement efforts. Moreover, it appears that the language found in the questions and their corresponding answer choices no longer align. Therefore, the Monitoring Team recommends that PPB revise its current Audit Methodology to ensure it allows for the clearest and most accurate accounting of the use of force reporting process; doing so would subsequently allow PPB to target for improvement individual audit elements that have identified deficiencies, or to identify other quality improvements with respect to use of force reporting.[29]

[29] For further information regarding the observation of the Monitoring Team that led to this recommendation, see our assessment of the City's compliance with Paragraph 74.

Addendum of Additional Remedies

Paragraph 188
Substantial Compliance

The Monitoring Team reviewed Force Data Collection Report (FDCR) and After-Action Report (AAR) forms completed by PPB members associated with 38 Category II or Category III uses of force from the Reporting Period.[30] PPB also provided us with meta-data identifying the times when all 357 FDCRs from the Reporting Period were created and submitted by reporting officers, as well as when they were approved by supervisors. Pursuant to Paragraph 188, both the FDCR and the AAR are required to capture when they are edited and completed.[31] **Our review of all of the materials provided confirmed that this requirement is consistently being met, with no more than a minor and occasional deviation.**

Our review found, with only a handful of exceptions, that the FDCR forms included timestamps certifying when they were submitted by the reporting PPB member as well as when they were approved by a supervisor. One FDCR was missing a supervisory approval timestamp, and five included two different officer submission timestamps. Although similar issues have been noted by the Monitoring Team in previous semi-annual compliance reports, their frequency was drastically lower during this Reporting Period. With respect to the AAR forms, all of them included a chain of custody section, which included timestamps stating when they were submitted from one reviewing supervisor to another. Additionally, the meta-data provided by PPB demonstrated that times of creation and submission were recoverable for all of the FDCRs from the Reporting Period.[32] Based

[30] These 38 cases, each of which included one or more FDCRs completed by officers, were the same ones in the sample selected by the Monitoring Team for its assessment of the City's compliance with paragraphs in the Use of Force section of the Settlement Agreement.

[31] Paragraph 188 also indicates that the revisions to these forms, made to capture editing and completion times, will be part of PPB's implementation of "Office365" [sic]. Starting with the first Reporting Period for which the Monitoring Team assessed the City's compliance with the Settlement Agreement (covering Q3-Q4 2024), the City informed us that the revisions to both forms had begun to be accessed "not through Office 365 but through a more effective and efficient web-based application". The particular platform utilized by PPB to capture the required times on its FDCRs and AARs did not impact our assessment of whether or not the times were indeed captured by the forms, as this paragraph requires.

[32] The Monitoring Team observed in its review of this data that the "created" time and "submitted" time, each measured to the minute, were identical for a sizeable number of FDCRs; and, for some other FDCRs, those two documented times differed by no more than a few minutes. In response to our inquiry regarding similar observations during a previous Reporting Period, PPB informed us that it is common practice for PPB officers to draft their report language in an external program before creating a new FDCR form. Once their report language has been drafted, the officers then create an FDCR form, copy and paste the report language into the form, and submit the form (for supervisory review and approval), all within a time span as short as one minute.

on our review, **the Monitoring Team concludes that PPB is in Substantial Compliance with Paragraph 188 of the Settlement Agreement.**

Recommendations:

The Monitoring Team makes the following recommendation to support ongoing compliance with Paragraph 188 of the Settlement Agreement:

1. Update the FDCR form such that it automatically flags for correction any instances when an officer submission or supervisory approval timestamp is not documented on the form, or any instances when more than one of those timestamps is recorded (not including instances such as resubmissions after rescindments, when multiple timestamps may be expected).[33]

Paragraph 192

Substantial Compliance

This paragraph of the Settlement Agreement requires the City to complete an investigation, through the Independent Police Review (IPR) to identify the following: 1) the PPB Lieutenant(s) and above who trained Rapid Response Team (RRT)[34] members to believe that they could use force against individuals during crowd control events without meeting the requirements of PPB Directive 1010.00; 2) the PPB incident commander(s) and designee(s) with the rank of Lieutenant or above who directed or authorized any officer to use force in violation of PPB Directive 1010.00, or who failed to ensure that FDCRs and AARs arising from the crowd control events starting on May 29, 2020, and ending on November 16, 2020, were completed as required by Section 13.1 of PPB Directive 635.10; and 3) the PPB Commanders and above who failed to timely and adequately clarify misunderstandings and misapplications of PPB policy (including the Settlement Agreement) governing the use, reporting, and review of force during the crowd control events starting on May 29, 2020, and ending on November 16, 2020. Furthermore, the City is required to hold accountable those investigated members who are determined to have violated PPB policies or the Settlement Agreement.

[33] After the close of the Reporting Period, the City indicated that it would determine whether this could be accomplished; if so, the City would then assess how much time it would take as well as what the financial impact would be.

[34] The City's website states, "The Rapid Response Team (RRT) is an all-hazard incident response team capable of quickly deploying bureau members with specialized training to respond to incidents requiring higher levels of technical expertise. This includes public assemblies, civil disturbances, and natural or man-made disasters."

To demonstrate its compliance with Paragraph 192's requirements, the City ultimately provided a set of six investigations conducted by IPR which, in combination, resulted in the adjudication of allegations consistent with those listed in the paragraph.[35] IPR had initially begun fulfilling its requirements pursuant to this paragraph by opening four separate-but-related investigations:

- One investigation into PPB Lieutenants and above who trained Rapid Response Team members to believe that they could use force against individuals during crowd control events without meeting the requirements of PPB Directive 1010.00;
- A second investigation into PPB incident commander(s) and designee(s) with the rank of Lieutenant or above who directed or authorized any officer to use force in violation of PPB Directive 1010.00;
- A third investigation into PPB incident commander(s) and designee(s) with the rank of Lieutenant or above who failed to ensure that FDCRs and After Action Reports arising from the crowd control events starting on May 29, 2020, and ending on November 16, 2020, were completed as required by Section 13.1 of PPB Directive 0635.10; and

[35] In its investigations, IPR noted that the allegations raised in this paragraph were worded in a conclusory manner. For instance, as opposed to inquiring whether RRT members were issued inappropriate training regarding the use of force and, if so, by whom, the first allegation in the paragraph is inherently based on the conclusion that such inappropriate training was indeed issued (by someone). The investigative task that fell to IPR for completion was, therefore, to determine who committed the misconduct which had already been concluded to have occurred. As indicated by IPR, however, no information (e.g. dates, times, witnesses, etc.) supporting the conclusion that the identified misconduct had occurred was provided to it as it initiated its investigations.

In further addressing the conclusory nature of the allegations in Paragraph 192, IPR cited concerns raised by the Compliance Officer/Community Liaison (COCL) in its Q2 2022 Compliance Report. In that report, the COCL stated, "…given the language of Par. 192 (including the underlying assumptions) as well as the overall nature of the investigations, there is a possibility that investigators may feel pressured to reach certain conclusions (e.g., to identify and hold accountable several PPB members as responsible for the observed outcomes). If true, this may undercut the entire goal of the accountability system being fair and consistent."

IPR indicated in one of its investigations (which ultimately led to the initiation of two others) that the conclusory nature of the allegations it was charged with investigating, combined with a lack of supporting information, led it to conduct its investigations differently than it would when conducting a typical administrative investigation. It appears that one such difference may be reflected by IPR's consideration of the appropriate scope of its efforts to identify subjects who committed misconduct that had already been concluded (in Paragraph 192's allegations) to have occurred. Based on extensive research and deliberation, IPR determined what it considered to be the most likely scenarios and circumstances in which to find such subjects, and it focused its investigative efforts on them.

The Monitoring Team concurs with IPR's description of Paragraph 192's allegations as conclusory as well as with the concerns raised by the COCL regarding the required investigation of those allegations. We believe those concerns were realized, to some degree, as evidenced by IPR's indication that it conducted its investigations pursuant to this paragraph's requirements differently than it otherwise would when investigating alleged misconduct. We consider this issue to be worthy of note both because it impacted the course of the investigations completed by IPR pursuant to this paragraph's requirements and because it factored into our overall assessment of the City's compliance with those requirements.

- A fourth investigation into PPB Commanders and above who failed to timely and adequately clarify misunderstandings and misapplications of PPB policy (including the Settlement Agreement) governing the use, reporting, and review of force during the crowd control events starting on May 29, 2020, and ending on November 16, 2020.

IPR intentionally utilized the second of those four investigations for the purpose of identifying potential subjects who might have engaged in some of the misconduct alleged in Paragraph 192. Upon the identification of two subjects (based on the second investigation), two additional separate-but-related investigations were initiated (one for each identified subject); this brought the total number of IPR investigations initiated pursuant to this paragraph to six. When accounting for their final dispositions, all six of these investigations were completed during this Reporting Period. IPR administratively closed the investigation it had intentionally used to identify potential subjects; the remaining five investigations—including the two generated from the administratively closed investigation—each resulted in the issuance of a final adjudication.

The Monitoring Team reviewed the IPR investigation files that were provided by the City as evidence of its compliance with the requirements in Paragraph 192. In each of the six investigations it conducted, IPR gave careful consideration to how it would carry out the process of identifying potential subjects who might have committed the misconduct raised by the allegations in the paragraph (as reflected by its utilization of one investigation precisely for this purpose; once again, that one investigation ultimately led to the initiation of two of the other six that were completed in total). IPR extensively detailed the circumstances surrounding the crowd control events between May and November of 2020 and gathered a voluminous amount of evidence demonstrating PPB's actions during those events. This evidence included, but was not limited to: interviews with PPB personnel; PPB members' email communications; intradepartmental memoranda, including Executive Orders issued by the Chief of Police; PPB training materials and attendance rosters; relevant court orders, statutes, and legislation; public statements issued by various City entities; email communications from the City; Incident Command System records; Uniform Daily Assignment Rosters; relevant PPB Directives; media reports from multiple sources; external assessments of the City's handling of protest and riot activity, as well as the City's response to it; PPB police reports, including General Offense Reports and After Action Reports; forensic reports; videos recorded by PPB; and videos recorded by members of the public.

Based on the foregoing, IPR identified one or more subject officers associated with each of the allegations of misconduct raised in Paragraph 192. Subsequently, and also based on the body of evidence it had gathered during its investigations, IPR recommended administrative findings as to whether each subject officer committed the alleged misconduct. The Deputy City Administrator, City Operations Service Area then proposed their own recommended findings for each subject officer; each of their recommended findings either concurred with or differed from those reached by IPR. Ultimately, the Mayor adopted all of the proposed findings of the Deputy City Administrator (covering each subject officer in IPR's series of investigations).

More specifically, the Mayor's findings were as follows:

- One allegation—failing to adequately clarify misunderstandings and misapplications of PPB policy governing the use, reporting, and review of force during crowd control events starting on May 29, 2020, and ending on November 16, 2020—was sustained against one subject officer based on a preponderance of the evidence;
- Two allegations—inappropriately directing PPB officers to use force in violation of Directive 1010.00, and failing to demonstrate appropriate leadership in the role of Crowd Management Incident Commander (CMIC) during the 2020 protests, leading to member injuries—were sustained against another subject officer based on a preponderance of the evidence;
- The Mayor found the remaining allegations of misconduct that were investigated by IPR to be not sustained as to the remaining subject officers.

In order to hold accountable the two subject officers who were ultimately determined by the City to have violated PPB policies, the Mayor designated a level of discipline deemed appropriate for each one. The Mayor indicated that these designations were arrived at pursuant to the PPB Discipline Guide in effect at the time of the violations.

For the first subject officer listed above, the Mayor designated "a command counseling" as the appropriate level of discipline. For the second subject officer listed above, the Mayor designated "a two-day suspension without pay" as the appropriate level of discipline. Notably, neither of these two subject officers remained employed by the City at the time the disciplinary findings against them were reached in association with the investigations conducted pursuant to Paragraph 192. As such, the City had no authority to impose administrative discipline against either subject officer.

Finally, the Monitoring Team noted that IPR initiated its first investigations pursuant to Paragraph 192 on June 29, 2022, which is one day beyond the deadline set out in that paragraph (within 60 days of the paragraph being entered as an order of the Court, which occurred on April 29, 2022). We consider this to clearly be a minor violation that was not systemic in terms of its impact on compliance with the paragraph's requirements.

The Monitoring Team determined that the City comprehensively fulfilled its investigative and accountability-related requirements pursuant to this paragraph without any major or systemic deviations. **We therefore conclude that the City is in Substantial Compliance with Paragraph 192 of the Settlement Agreement.**

Recommendations:

Pursuant to Settlement Agreement Paragraph 226, the Monitoring Team recommends the following steps necessary to achieve and maintain Substantial Compliance with Paragraph 192:

1. In order to fulfill this paragraph's requirement to hold accountable those investigated members of the rank of Lieutenant and above who are determined to have violated PPB policies, and should either of the subject officers found to have committed such violations return to employment with the City, impose the discipline determined to be appropriate by the Mayor in association with the allegation(s) of misconduct that were sustained against them.

Paragraph 194

Partial Compliance

Settlement Agreement Paragraph 194 requires the implementation of body-worn cameras (BWCs) at PPB by the City. More specifically, it requires: that the BWCs be implemented pursuant to a policy that is subject to the policy review-and-approval provisions of the Settlement Agreement; that the City comply with collective bargaining obligations related to BWCs; that public input on the use of BWCs be gathered to inform the policy governing them; and that the City may be required to update the Court upon the completion of the collective bargaining process.

For the Monitoring Team's assessment of compliance with this paragraph, we reviewed a number of materials including:

- PPB Directive 0620.00 Body-Worn Camera Use and Management;
- Multiple policy development documents that preceded the current version of Directive 0620.00;
- Communication regarding the process of collective bargaining about PPB's BWC policy;
- Communication between the Parties regarding PPB's BWC policy;
- A report prepared on Feruary 18, 2022 by the Compliance Officer/Community Liaison titled, "Body-Worn Cameras for the Portland Police Bureau: History and Community Engagement Results."

Additionally, pursuant to the requirements of Directive 0620.00, the Office of the Inspector General (OIG) performed an audit to confirm that PPB's BWC equipment is being used in accordance with applicable policy.[36] The audit assessed policy requirements for both members' use of BWC

[36] Although the audit is dated August 2026, which is after the close of the current Reporting Period, its findings address compliance solely within the Reporting Period.

equipment pursuant to Directive 0620.00 and supervisors' reviews of BWC videos in compliance with Directive 0910.00 Use of Force Reporting, Review, and Investigation. The Monitoring Team reviewed the BWC Audit Methodology that was provided by the OIG as well as the PPB OIG Body-Worn Camera Compliance Assessment report containing the audit results.

Furthermore, in order to assess the consistent and verified performance of the BWC policy that was ultimately enacted by PPB, the Monitoring Team performed its own audit of BWC recordings from 22 randomly selected PPB incidents that occurred in the current Reporting Period and during which an officer's BWC was activated; we also reviewed the associated computer-aided dispatch (CAD) reports and narrative reports for each incident.[37] The Monitoring Team endeavored to complete a rigorous and thorough evaluation of each incident in our sample. Guided by the multiple requirements that officers must fulfill pursuant to PPB Directive 0620.00, our review of each incident encompassed determinations on 44 different elements (amounting to nearly 1,000 elements across the entire sample).

The Monitoring Team's review found that the City complied with nearly every requirement in the portion of Paragraph 194 that is focused on the development of a BWC policy and the logistics of rolling out a BWC program to PPB.[38] However, audits assessing adherence to the BWC policy that was ultimately implemented by PPB revealed numerous deviations that are neither minor nor occasional.

From the results of the BWC Audit performed by the OIG, the Monitoring Team noted three primary findings:

1. PPB members delivered required BWC recording announcements when making initial contact with members of the public 33 percent of the time.[39]

[37] There were 8,127 cases created in the Axon system during the Reporting Period. The Monitoring Team sampled every 325th case, rejecting those associated with incidents that did not occur during the Reporting Period or for which no BWC video was included. A total of 36 cases were examined in order to ultimately identify 25 meeting the audit criteria. Three cases from among those 25 were then excluded from the analysis because, despite having records in evidence.com created during the Reporting Period, they had BWC video that was recorded during incidents occurring prior to that period.

[38] The one deviation that we noted from this portion of Paragraph 194 was that implementation of the program was not complete by the deadline set in the paragraph. We found such a deviation unsurprising, given the many foreseeable and unforeseeable challenges of completing a project as complex as this one, and we maintain our belief that it amounts to only a minor deviation from this aspect of the requirements in Paragraph 194, with no systemic impact.

[39] PPB reports that it was unclear whether members delivered the BWC notification to the public in 8 percent of cases, and that they failed to do so at the beginning of the interaction, as required, in 59 percent of cases. Additionally, among that latter group (of 59 percent) of cases, members delivered the required notification at a later point during the interaction 9 percent of the time.

2. Supervisors completed required BWC video reviews of certain types of incidents, as further specified in PPB policy, 68 percent of the time.
3. In cases requiring a verbal justification for the deactivation of their BWCs, PPB members provided the required justification 25 percent of the time.

In addition to these findings, the OIG's audit determined that PPB members demonstrated greater adherence to requirements in policy governing when they must activate their BWC recordings, with a compliance rate of 87 percent.[40] Members were found to have deactivated their BWC recordings earlier than expected in three percent of their interactions with the public. Also, among the 50 interactions during which PPB members were required to either stop their BWC recordings or not activate them at all, the OIG's audit found that they complied with those requirements 82 percent of the time.

The OIG's audit finding that supervisors completed 68 percent of their required reviews of BWC footage (as indicated above) was not consistent across all precincts and units. For example, completion rates of the required reviews across each supervisory rank were highest in Central precinct, second highest in East precinct, third highest in North precinct, and lowest in the Specialized Resources Division (SRD). Furthermore, the completion rate declined across supervisory ranks as those ranks moved progressively higher: sergeants completed 81 percent of their required reviews; lieutenants completed 72 percent of theirs; captains completed 58 percent of theirs; and a designee of the Chief completed 43 percent of required reviews. Finally, and specifically with respect to Category II use of force incidents, the OIG's audit found that supervisors effectively recorded member interviews following such incidents, as required, 60 percent of the time.

The Monitoring Team's audit of adherence to BWC policy examined how often PPB officers completed a required BWC notification upon initial contact with a member of the public; how often delayed BWC notifications were given; whether members muted or deactivated their BWC recordings in accordance with policy; whether members deactivated or avoided activating BWC recordings in specifically designated locations (e.g., medical facilities, courthouses, restricted areas of law enforcement facilities, etc.); whether BWC recordings were documented in appropriate reports; and whether BWC interviews were obtained as required by policy in certain cases where PPB members used force against subjects. In areas where the Monitoring Team's audit overlapped with the OIG's audit, our findings were largely consistent with theirs.

As to other areas of adherence to BWC policy audited by the Monitoring Team, we found that PPB members wore their cameras at chest level in all BWC videos we reviewed, and that they did so in such a manner as to provide an unobstructed view of their activities and interactions with the

[40] PPB reported that members effectively activated their BWCs as required in 89 percent of 658 in-person contacts and 81 percent of 202 phone contacts. The Monitoring Team used these data to determine that, across all contacts, PPB members demonstrated compliance with requirements to activate their BWCs at a rate of 87 percent.

community. Furthermore, among six cases in which PPB emergency vehicle lights were confirmed to have been activated, and in which the Monitoring Team could determine whether BWCs were automatically activated in turn, as required by policy, our audit found compliance in four of the cases (67 percent). In the other two cases, the officers whose BWCs did not automatically activate were passengers in a patrol vehicle and may not have had their equipment connected for automatic activation. Automatic activation of BWCs is also required whenever PPB members draw their Conducted Electrical Weapons (CEWs) or firearms from their holsters (if they were not already activated at that time). When those actions occurred in the sample of cases we reviewed, we found that officers' BWCs had already been activated.

The City satisfied the policy and logistical portions of Paragraph 194's requirements in a comprehensive fashion and with a high level of integrity. Additionally, during this Reporting Period, PPB completed a required audit of members' compliance with Directive 0620.00. The OIG's BWC Audit methodology remains sound, and the Monitoring Team recognizes the considerable time and effort that PPB devoted to its completion. Additionally, we believe it is important to note that the latest audit reflects overall improvement with respect to compliance with applicable BWC requirements when compared with the corresponding audit we reviewed for our previous semi-annual compliance report (covering the Reporting Period from Q3-Q4 2025).

As indicated by the results of both PPB's latest audit and the Monitoring Team's, however, substantial deviations across multiple requirements persisted during this Reporting Period with respect to the performance of PPB's BWC policy in actual practice. Additional work is needed to decrease the rate of those deviations. **We therefore conclude that the City is in Partial Compliance with Paragraph 194 of the Settlement Agreement.**

Recommendations:

Pursuant to Settlement Agreement Paragraph 226, the Monitoring Team recommends the following step necessary to achieve and maintain Substantial Compliance with Paragraph 194:

1. PPB should provide continued training and enforcement to all officers regarding the requirements in PPB Directive 0620.00. Specific attention should be paid to the following provisions within the policy: a) notifying persons that they are being recorded; b) recording verbal justifications and/or written justifications in an associated report prior to deactivating or muting a recording; c) stopping a recording and restarting a recording after stopping it; and d) supervisor responsibilities to review BWC video.

Paragraph 195

Partial Compliance

Settlement Agreement Paragraph 195 requires the City to take a series of actions that ultimately result in the establishment of a new oversight board to replace IPR for investigations of certain complaints of police misconduct and to replace the Chief of Police for imposition of discipline. That board is presently emerging in the form of two new entities, which are designed to be interconnected in their operations: the Community Board for Police Accountability (CBPA) and the Office of Community-based Police Accountability (OCPA). Working together, these entities are intended to comprise a new Oversight System for the City that will replace the previous collection of organizations charged with overseeing PPB and, in doing so, help fulfill the requirements of Paragraph 195.

In order to assess compliance with this paragraph, the Monitoring Team reviewed: numerous communications between the Parties regarding the complex and multi-faceted transition to the new Oversight System; City Council Resolution 37637, Ordinance 190812, and Report 2025-246; and multiple materials used by the City to recruit the initial members of the CBPA. The Monitoring Team also met directly with Oversight System staff, received regular written updates from the City on the CBPA's activities and progress toward the implementation of the Oversight System, and attended the CBPA's regular meetings, both remotely and in person.

As described in our previous report, the City has evidenced its completion of the many tasks required of it by Paragraph 195, with only minor exceptions or deviations, up to the close of the current Reporting Period. The records reviewed by the Monitoring Team indicate that the City Auditor and City Council each submitted a plan to the DOJ addressing the transition to the new Oversight System after the January 1, 2022, deadline for doing so; however, both plans were apparently still submitted within a month of that deadline. In other words, any delay that occurred appears to be only a minor one, particularly given the intricate issues involved in this transition to an entirely new system. Also, although no documentation explicitly illustrated the DOJ's determination of an acceptable plan from amongst those submitted by the City Auditor and City Council, which was required prior to the City Council's adoption of such a plan, it seems clear that there was no issue with this part of the transition process required by the Settlement Agreement.[41] Additionally, although no data was provided with the specific purpose of illustrating that the City has ensured that administrative investigations of PPB members are completed and that officers are held accountable for violating PPB policy and procedure, the Monitoring Team's review of multiple administrative investigations and their outcomes when subject officers are found to have violated policy is sufficient evidence for us to confirm that the City has met this requirement in practice.

[41] No concerns regarding the DOJ's determination of an acceptable transition plan, in compliance with Settlement Agreement Paragraph 195, were mentioned in the DOJ's Seventh Periodic Compliance Assessment Report (which was filed with the Court on August 8, 2023).

The one major requirement in Paragraph 195 that remains unfulfilled as of the end of the current Reporting Period is for the new Oversight System (consisting of the CBPA and the OCPA) to be staffed and operational. This was required to occur within 12 months of the City Council's adoption of the City Code provisions necessary to establish the system, which occurred on September 11, 2024.[42] Although this requirement was not completed by that deadline, or within the current Reporting Period at all, the Monitoring Team notes that the Settlement Agreement provides for a reasonable extension for good cause shown, provided that the City is in Substantial Compliance with other parts of the paragraph.

Of significant note, and continuing to build on progress previously made toward the staffing and operationalization of the Oversight System, following are some of the updates the City provided to the Monitoring Team detailing its efforts toward compliance with the requirements in Paragraph 195 during this Reporting Period:

- The CBPA began holding public meetings and adopted the Democratic Rules of Order as the foundation of its meeting structure, with an additional process for building consensus before votes. It established a regular meeting schedule and authorized the hiring of a clerk, a general analyst, a communications specialist, and a facilitator for its meetings.
- The CBPA voted to use a private recruiting firm to assist it with selecting the first Director of the OCPA. Subsequently, the recruiting firm hosted three listening sessions with CBPA members and ten listening sessions with community members, PPB leadership, City leadership, and others. During an executive session, the CBPA received a presentation from the recruiting firm on the top candidates it had identified to fill the position of OCPA Director.
- The position description for a CBPA clerk was provided to CBPA members for feedback prior to its submission to the City's Bureau of Human Resources; work was reportedly continuing on the position descriptions for an analyst and a communications specialist.
- The City indicated that it was working on a request for proposals for background check vendors as well as the development of a website tool to support the Oversight System's public testimony, meeting schedules, agendas, and related documents.

These updates reflect meaningful steps taken by the City toward the complex and multidimensional task of establishing a brand-new system of civilian oversight for PPB. Given that the staffing and operationalization of the Oversight System remained pending as of the close of this Reporting Period, however, additional work pursuant to this paragraph's requirements is still needed. **The**

[42] The City informed the Monitoring Team (during a previous Reporting Period) of its position that the 12-month period referenced in this part of Paragraph 195 should not commence until January 2, 2025 because amendments to the Settlement Agreement that were made in conjunction with the City's establishment of the new system did not become effective until that date.

Monitoring Team therefore concludes that the City is in Partial Compliance with Paragraph 195 of the Settlement Agreement.

Recommendations:

Pursuant to Settlement Agreement Paragraph 226, the Monitoring Team recommends the following step necessary to achieve and maintain Substantial Compliance with Paragraph 195:

1. The City should maintain its commitment to fully staffing the Oversight System and ensuring its operability as expediently as it feasibly can.

Discrete Sections in Self-Monitoring[43]

Pursuant to the Settlement Agreement, the following paragraphs (which the Settlement Agreement groups into "discrete sections" as indicated) were subject to self-monitoring by the City during the Reporting Period:

- 85-86 (training audits, analyses, and recommendations);
- 116-118 (EIS operation);
- 121-123 (investigation timelines);
- 128-129 and 131-133 (conduct of IA investigations);
- 148, 150, and 193 (PPB Stops Data and Annual Reports);
- 189 (outside review of 2020 protest response); and

For each of these paragraphs, the City created a self-monitoring plan and shared it with the Monitoring Team for our consultation. We reviewed the plans and provided commentary back to the City aimed at ensuring that each plan emphasized assessments to evidence continued Substantial Compliance with the Settlement Agreement.

The City additionally prepared a compliance report for each paragraph subject to self-monitoring. The Monitoring Team evaluated those reports to determine whether the City had maintained Substantial Compliance in accordance with its self-monitoring plans. Pursuant to the Settlement Agreement's provisions, if the City has adequately demonstrated maintained Substantial Compliance with any of the discrete sections listed above for two consecutive semi-annual reports, the discrete section will be subject to termination. Alternatively, if the City has not adequately demonstrated maintained Substantial Compliance with any of the discrete sections listed above, then the City is required to prepare additional semi-annual reports until the Monitoring Team determines it has adequately demonstrated maintained Substantial Compliance for two consecutive reports.

The Monitoring Team's evaluations of the City's compliance reports found that, with one exception, the City did maintain Substantial Compliance in accordance with its self-monitoring plans. Below is a chart reflecting the Monitoring Team's evaluations; further detail about our evaluation of each discrete section follows.

[43] According to Paragraph 249 of the Settlement Agreement, "Self-monitoring is a transition phase that involves continued Monitor review of the City's methodology and self-assessments while allowing the City to demonstrate its ability to sustain compliance after termination." For a full description of self-monitoring, including how discrete sections are identified for such status, requirements regarding self-monitoring plans and semi-annual compliance reports prepared by the City, and evaluations conducted by the Monitor, see Paragraphs 253-259 of the Settlement Agreement.

Self-Monitoring Evaluation Chart

Self-Monitoring Paragraph/Discrete Section	Evaluation Determined City Has Maintained Substantial Compliance
Paragraph 85	Yes
Paragraph 86	Yes
Training Audits, Analyses, and Recommendations	**City Has Adequately Demonstrated Substantial Compliance**
Paragraph 116	No
Paragraph 117	Yes
Paragraph 118	Yes
EIS Operation	**City Has Not Adequately Demonstrated Substantial Compliance**
Paragraph 121	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Paragraph 122	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Paragraph 123	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Investigation Timelines	**Yes (with former paragraphs of discrete section)**
	No (with current paragraphs of discrete section)
Paragraph 128	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Paragraph 129	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Paragraph 131	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Paragraph 132	Yes (with former provisions of paragraph)
	No (with current provisions of paragraph)
Paragraph 133	Yes
Conduct of IA Investigations	**Yes (with former paragraphs of discrete section)**
	No (with current paragraphs of discrete section)
Paragraph 148	Yes
Paragraph 150	Yes
Paragraph 193	Yes
PPB Stops Data and Annual Reports	**City Has Adequately Demonstrated Substantial Compliance**
Paragraph 189	Yes
Outside Review of 2020 Protest Response	**City Has Adequately Demonstrated Substantial Compliance**

Paragraphs 85-86 (Training Audits, Analyses, and Recommendations)

Paragraph 85

Settlement Agreement Paragraph 85 requires PPB to audit its training program using the following performance standards to ensure PPB does the following: 1) conducts a comprehensive needs assessment annually; 2) creates a Training Strategic Plan annually; 3) develops and implements a process for evaluation of the effectiveness of training (within 180 days of the Effective Date of the Settlement Agreement); 4) maintains accurate records of training delivered, including substance and attendance; 5) makes training records accessible to the Director of Services, Assistant Chief of Operations, and DOJ; 6) trains officers, supervisors, and commanders on areas specific to their responsibilities; and 7) ensures sworn PPB members are provided a copy of all PPB directives and policies issued pursuant to the Settlement Agreement and that they sign a statement acknowledging that they have received, read, and had an opportunity to ask questions about the directives and/or policies, within 30 days of the release of the directives and/or policies.

PPB's self-monitoring plan for this paragraph of the Settlement Agreement indicates that compliance with it will be assessed by verifying that an audit has been completed in accordance with the requirements outlined in the paragraph. The plan additionally notes that Training Division audits fulfilling the paragraph's requirements were conducted in 2017, 2018, and 2022, and it further notes that no such audit was conducted during this Reporting Period due to the infeasibility of doing so. The evidence that PPB provided in support of its compliance consisted of its December 2022 Training Division Assessment.

PPB's compliance report indicated that its 2022 Training Division Assessment successfully met each requirement listed in Paragraph 85. The compliance report concluded that PPB was in Substantial Compliance with this paragraph for this Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

Paragraph 86

Among other things, Paragraph 86 requires PPB's Force Inspector to present data and analysis on a quarterly basis regarding patterns and trends in officers' uses of force to the Chief of Police (Chief), Training Division, and the Training Advisory Council (TAC). Training Division and the TAC are responsible for making recommendations to the Chief regarding policy, training, and/or evaluations based on that data, and the Chief must assess all patterns that Training Division and/or TAC identify and implement remedial measures to address any deficiencies. Additionally, the Force Inspector must, in coordination with Professional Standards Division (PSD), identify problematic use of force patterns and training deficiencies.

In order to evidence compliance with Paragraph 86, PPB provided documents including: the presentations of Q3 and Q4 2025 use of force data made to the TAC (during its meetings on

January 14 and March 11, 2026, respectively), with supporting notes addressing trend analyses; Force Analysis Summary Reports covering Q3 and Q4 2025 (on which the presentations of use of force data are based); TAC agendas and transcripts from both of those meetings; correspondence from the Office of the Inspector General (OIG) to the Chief's Office transmitting both presentations of quarterly use of force data, stating that no problematic patterns had been identified within the data, and also stating that no communications were received from either Training Division or the TAC identifying any concerning patterns; the Force Inspector's AAR Phase II Review Spreadsheet; records reflecting scheduled meetings between the OIG and various other PPB personnel during the Reporting Period, each of which was initiated by the Force Inspector and specifically referenced both the OIG and PSD in the subject line regarding the meeting; and a tracking document titled, "Inspector Feedback Loop".

PPB's self-monitoring plan for assessing compliance with Paragraph 86 addresses in both its objectives and its methodologies confirmation that the Force Inspector gathered and presented required data and analysis "at least once per successive three-month period" to the TAC, Training Division, and the Chief. Noting differences in the cadence of TAC's scheduled meetings and PPB's production of its Quarterly Force Analysis Summary Reports, PPB's compliance report affirmed that two presentations of the required data were made by the Force Inspector during this Reporting Period; and, when incorporating a look back at the previous Reporting Period (thereby considering a full year instead of only six months), those two presentations were made on a quarterly basis (once per successive three-month period).

PPB's compliance report reflected the absence of any written recommendations during this Reporting Period from the TAC or Training Division to the Chief based on the data presented by the Force Inspector; and, consequently, the absence of any actions taken by the Chief in response. The compliance report also cited the documentation of eight scheduled meetings between the Force Inspector and PSD as evidence of compliance with Paragraph 86's requirement that they coordinate to identify problematic issues related to the use of force and training. Finally, the compliance report cited information from the provided Inspector Feedback Loop in finding that the Force Inspector identified six cases during the Reporting Period that included problematic use of force patterns and/or training deficiencies.[44]

PPB's compliance report concluded that PPB maintained Substantial Compliance with Paragraph 86 for this Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

[44] PPB's compliance report further noted that, as a result of four of these issues, Training Division provided a response, and either they or PPB's Policy Division resolved the matter. The remaining two issues resulted in administrative closures—one in which Training Division provided a response, and one in which it did not because the matter was resolved at the Responsibility Unit level.

With regard to the Training Audits, Analyses, and Recommendations discrete section of the Settlement Agreement, the Monitoring Team's evaluation of PPB's compliance report found that the City has adequately demonstrated that it has maintained Substantial Compliance with the section.

Paragraphs 116-118 (EIS Operation)

Paragraph 116

This paragraph addresses enhancements to PPB's Employee Information System (EIS) aimed at more effectively identifying at-risk employees, supervisors, and teams, with the intention of addressing potentially problematic trends in a timely fashion. Specifically, Paragraph 116.a. states that PPB must require commanders and supervisors to conduct prompt reviews of EIS records of employees under their supervision and document that the review has occurred in the EIS performance tracker; Paragraph 116.b. states that PPB must require commanders and supervisors to promptly conduct reviews of EIS for officers new to their command and document that the review has occurred in the EIS performance tracker; and Paragraph 116.c. requires that EIS staff regularly conduct data analysis of units and supervisors to identify and compare patterns of activity.

With respect to Paragraph 116.a., PPB's self-monitoring plan included amongst its data sources a table showing how many annual performance evaluations—which, pursuant to PPB Directive 0345.00 Employee Information System (EIS), must include a review of the evaluated member's EIS record—were completed on time during the Reporting Period and how many were not. PPB Directive 0215.00 Member Performance Evaluations requires supervisors to complete these evaluations by the last day of the month of the evaluated member's employment anniversary date. Reflecting information taken from the table, PPB's compliance report found that 91.6% of the performance evaluations required during the Reporting Period were completed on time.

Similarly, with respect to Paragraph 116.b., PPB's self-monitoring plan included amongst its data sources a second table showing how many reviews of EIS records following a member's transfer from one assignment to another were completed on time during the Reporting Period and how many were not. PPB Directive 0345.00 Employee Information System (EIS) requires such reviews to take place whenever supervisors have sworn members new to their command, whether due to the transfer of the supervisor or the sworn members; the reviews must be completed within 30 days of the associated transfer. Reflecting information taken from the table, PPB's compliance report found that 62% of the EIS reviews following a member's transfer during the Reporting Period were completed on time.

Finally, with respect to Paragraph 116.c., PPB's self-monitoring plan included amongst its data sources a third table that combined the information from the two tables relied upon for the assessment of compliance with Paragraphs 116.a. and 116.b. As was listed in the third table, PPB's

compliance report reflected an aggregated on-time rate of 85.29% for the combined information. PPB's compliance report also referenced the processing of automated EIS threshold alerts as evidence of compliance with the requirement for EIS staff to conduct required analysis of units and supervisors.[45]

PPB's compliance report concluded that PPB maintained Substantial Compliance with Paragraph 116 for this Reporting Period. PPB's self-assessment determined there was a high rate of timely EIS reviews as part of members' annual performance evaluations during the Reporting Period (91.6%), which it relies on to evidence compliance with the requirement in Paragraph 116.a. In contrast, however, the self-assessment determined that the rate of timely EIS reviews subsequent to a member's transfer, which it relies on to evidence compliance with the requirement in Paragraph 116.b., was not nearly as high (62%). **This represents a major deviation from that requirement during the Reporting Period and signifies that additional work is needed to maintain Substantial Compliance with it.**[46] Finally, with regard to Paragraph 116.c., PPB's confirmation of the continued processing of threshold alerts by EIS staff sufficiently demonstrates compliance in accordance with the self-monitoring plan.[47]

Therefore, the Monitoring Team's evaluation found that the City has not maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.

Paragraph 117

This paragraph requires PPB to use force audit data to conduct analyses at the supervisor and team levels to identify and compare patterns of activity. PPB's self-monitoring plan identified a number of data sources to include in its assessment of compliance with this paragraph's requirements, including its Quarterly Applications of Force Reports, memos from the Force Inspector to Responsibility Unit Managers (RUMs), and EIS Type III Alert Case Notes.[48] The plan's methodology included verifying

[45] The Monitoring Team noted that PPB's self-monitoring plan did not include amongst its data sources Professional Standards Division's SOP #44 Employee Information System (EIS) Alert Processing Guide, which addresses how EIS threshold alerts are processed. We believe it is important to include this SOP as a data source that helps to evidence compliance with this part of Paragraph 116.

[46] This rate decreased approximately 21 percentage points from the Previous Reporting period (Q3-Q4 2025), when it was 83.1%. The Monitoring Team acknowledges a notation in PPB's compliance report indicating that, in response to the decrease, the Commander of Professional Standards Division sent a reminder to Responsibility Unit Managers "to put command emphasis on the issue."

[47] The Monitoring Team does not, however, consider the combination of data used to demonstrate compliance with Paragraphs 116.a. and 116.b. sufficient to demonstrate compliance with Paragraph 116.c.

[48] PPB Directive 0345.00 Employee Information System (EIS) defines a Type III Alert as follows: "An alert notification that pertains to statistically meaningful deviations from normative behavior, with respect to groups and their respective supervisors, which the Force Inspector has determined places such groups and the respective supervisors at risk of problematic trends."

that the Quarterly Applications of Force Reports covering this Reporting Period break data down by precinct, shift, and rank, and that they highlight officers who may need command attention; the methodology also included verifying that the Force Inspector submitted memos to RUMs based on data from the Applications of Force Reports.

Based on a review of the indicated data sources, and pursuant to the methodology in its self-monitoring plan, PPB's compliance report confirmed that the analyses of use of force data required by Paragraph 117 were completed during the Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

Paragraph 118

This paragraph requires PPB to continue using its existing EIS performance thresholds to trigger case management reviews, and to specifically include the following two thresholds amongst them: a) any officer who has used force in 20% of his or her arrests in the past six months; and b) any officer who has used force three times more than the average number of uses of force compared with the other officers on the same shift. PPB's self-monitoring plan identified a number of data sources to include in its assessment of compliance with this paragraph's requirements, including one table generated from EIS data that reports the type and number of threshold breaks during the Reporting Period, and another table that reports the type and number of EIS Alerts (based on those threshold breaks) sent to Responsibility Unit Managers (RUMs) for their review during the Reporting Period. The plan's methodology included verifying that the EIS Administrator processed cases for review utilizing all threshold breaks required by the Settlement Agreement and PPB policy; the methodology also included verifying that any EIS Alerts which had been administratively closed were eligible for such closure in accordance with PPB policy.

Based on a review of the indicated data sources, and pursuant to the methodology in its self-monitoring plan, PPB's compliance report confirmed that PPB continued to utilize all required EIS thresholds, including the two specifically listed in Paragraph 118, to trigger case management reviews during the Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

With regard to the EIS Operation discrete section of the Settlement Agreement, the Monitoring Team's evaluation of the City's compliance report found that the City has not adequately demonstrated that it has maintained Substantial Compliance with the section.

Paragraphs 121-123 (Investigation Timelines)

The Settlement Agreement paragraphs in this discrete section include requirements, responsibilities, and/or other references to the Oversight System, which is defined in the Agreement as the combination of the Community Board for Police Accountability (CBPA) and the Office of Community-based Police Accountability (OCPA). The Monitoring Team notes that neither part of the Oversight System was operational during this Reporting Period with respect to initiating, conducting, or adjudicating administrative investigations. The same paragraphs in previous versions of the Settlement Agreement—in effect prior to this Reporting Period—instead included requirements, responsibilities, and/or other references to the City, the Citizen Review Committee (CRC), the Police Review Board (PRB), and/or the Independent Police Review (IPR). With regard to Settlement Agreement provisions in this discrete section that reference the Oversight System, the City focused its self-monitoring plans on the language in the current version of the Agreement; in contrast, the City focused its associated compliance reports, as well as the materials it provided in support of evidencing compliance, on the language in previous versions of the Agreement. Based on the materials that were provided to us, the Monitoring Team evaluated the City's compliance with the provisions from previous versions of the Settlement Agreement. Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity for the City to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement.[49]

The Monitoring Team believes it is important to acknowledge the City's and PPB's responsiveness to our prior recommendations regarding the review and documentation supporting self-monitoring in this section. During this Reporting Period, the City and PPB strengthened those efforts by adding new memoranda and tracking spreadsheets, implementing additional processes to confirm investigation initiation dates, and providing the Monitoring Team with additional supporting documentation, all of which improved the thoroughness and reliability of the self-monitoring record.

Paragraph 121

Paragraph 121 of the Settlement Agreement requires PPB and the City to complete all administrative investigations of officer misconduct, including supervisory investigations, within 180 days of receipt of a complaint of misconduct or discovery of misconduct by other means. The paragraph defines the completion of an investigation as including "all steps from intake of complaints through approval of recommended findings by either the CBPA or the Chief, or approval by the Mayor for investigations involving the Chief, as appropriate." PPB's self-monitoring plan for this paragraph calls for comparing the verified initiation date and the "Disposition" date for all administrative investigations closed during the Reporting Period (thereby yielding the duration of each case); it

[49] For additional commentary on the discrepancy between the City's self-monitoring efforts and the provisions of the Settlement Agreement that reference the Oversight System, see this report's section titled, "Work to be Completed; Anticipated Barriers to Substantial Compliance."

additionally calls for the accounting of relevant tolling data in calculating those case durations, essentially removing from the calculation the total number of days (if any) when the investigation was paused for a valid reason. The data sources relied on by PPB in conducting its self-assessment of compliance with this paragraph include a report of all cases closed during the Reporting Period, a report on all such cases that were tolled for some period of time, and administrative investigation reports for cases closed during the Reporting Period.

Based on the data it gathered, PPB determined that a total of 145 investigations were closed during the Reporting Period; and, when accounting for any applicable tolling periods, 124 of those investigations (approximately 85.5 percent) were completed within the timeline required by Paragraph 121. Of the 78 IA investigations, 66 were completed within 180 days while 12 exceeded that duration. Of the 67 IPR investigations, 58 were completed within 180 days while nine exceeded that duration. PPB further reported that, in response to the Monitoring Team's comments, it reviewed the administrative investigation reports for IA investigations to verify the initiation dates used in the timeliness analysis.

In considering this rate of timely completion, the Monitoring Team believes it is important to also consider the composition of the investigations that exceeded 180 days. Six of the nine IPR investigations that exceeded that timeline were investigations completed during this Reporting Period pursuant to Paragraph 192 of the Settlement Agreement. Those investigations arose from PPB's response to crowd control events in 2020 and were initiated in 2022. Although those six investigations far exceeded 180 days, the Monitoring Team recognizes that they are exceptional outliers when compared to other administrative investigations. If these six investigations are removed from the calculation of the timeliness of PPB's and the City's investigations pursuant to this paragraph (as aberrations), the rate of those completed within 180 days is 89.2 percent (124 investigations out of 139). The Monitoring Team considered this context in determining whether the percentage of timely completed investigations was sufficient to demonstrate maintained Substantial Compliance.

The Monitoring Team's review of materials relied on to demonstrate compliance with this paragraph identified several instances in which the date used in PPB's timeliness analysis did not appear to correspond precisely to the date a complaint was received or potential misconduct was discovered. In those instances, the date when IA received or was notified of the matter at issue was used by PPB for its calculations, even if it was after the date when the issue was first discovered by PPB. Importantly, none of the identified discrepancies had any impact on PPB's rate of compliance with the 180-day timeline required in Paragraph 121, which the Monitoring Team considered when conducting our evaluation of PPB's self-assessment of compliance with the paragraph. However, in order to ensure that compliance with this paragraph's requirements related to timeliness is maintained in the future, we believe it would be advisable for PPB to determine the date when a complaint is received or potential misconduct is discovered—instead of the date when IA received or was notified of such matters, if those dates do not happen to be the same—and to utilize that

date to calculate the duration of the ensuing administrative investigation. We communicated this guidance to PPB after the close of the Reporting Period.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.**

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

Paragraph 122

Paragraph 122 of the Settlement Agreement requires PPB and the Oversight System to conduct administrative investigations concurrently with criminal investigations, if any, when those investigations concern the same incident; it additionally affirms that all administrative investigations must be subject to appropriate tolling periods as necessary to conduct a concurrent criminal investigation, as provided by law, or as necessary to meet a recommendation from PPB or the CBPA to conduct further investigation.

Tolling, in this context, refers to the temporary pausing of an administrative investigation's timeline for an authorized reason, wherein the tolled time is not counted toward the applicable deadline for the completion of the investigation. Authorized reasons for tolling an administrative investigation's timeline include the presence of a pending parallel criminal investigation and/or the unavailability of a member due to protected leave. In addition, PPB and the Oversight System may toll up to 10 business days per investigation when necessary to ensure either the complainant's or involved officer's attorney is available to accompany them at an intake or investigatory meeting.[50]

PPB identified 26 incidents from this Reporting Period that involved both administrative and criminal investigations. PPB's self-monitoring plan for this paragraph calls for utilizing a Criminal/IA Concurrent Investigation Audit, a confirmation audit conducted by a Senior Police Administrative Support Specialist (PASS) from Internal Affairs, a Tolling Report, and a memorandum documenting explanations for discrepancies between criminal and administrative investigation initiation dates to validate that: 1) PPB conducted administrative investigations concurrently with criminal investigations; and 2) all administrative investigations were subject to

[50] A report provided by PPB of cases closed during the Reporting Period that had been subject to tolling listed a total of 32 such cases, with the total number of days tolled per case ranging from one day to 938 days. The reasons for differences in tolling durations varied widely based on the specific facts and circumstances of the underlying event and/or the complexity of the investigative process.

appropriate tolling based on any of the reasons identified in this paragraph of the Settlement Agreement.

The information contained in the Criminal/IA Concurrent Investigation Audit and the confirmation audit confirms the investigation start dates for the criminal and Internal Affairs (administrative) investigations in each of the 26 cases identified by PPB as being subject to Paragraph 122. In 21 of the 26 cases, the criminal and administrative investigations were initiated on the same date, while this was not so for the remaining five cases. For all five of those cases, the confirmation audit conducted by a Senior PASS included the reason behind the discrepancy in initiation dates. Those explanations generally reflected brief timing or notification issues, including, for example, information received after business hours or late at night and forwarded at the beginning of the next workday, complaints received when IA command staff were off duty and forwarded to Detectives at the beginning of the following work week, notice that did not initially include Detectives and was subsequently forwarded by IA, or a potential criminal allegation identified during a findings review and then referred to Detectives.

With respect to tolling, PPB reported that 14 of the 26 cases were still being actively tolled, and that tolling had concluded in the remaining 12 cases. In its compliance report, PPB listed the 26 cases initiated during the Reporting Period that it had identified as having administrative and criminal investigations into the same incident, noted the opening dates for each of the investigations into those incidents, stated whether information was provided regarding any discrepancy between the opening dates, and identified whether or not the cases had been subject to tolling.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.**

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

Paragraph 123

Paragraph 123 of the Settlement Agreement requires that if PPB or the Oversight System is unable to complete an administrative investigation of officer misconduct within 180 calendar days, it must undertake and submit to the Monitoring Team and the DOJ a written review of the investigation identifying the source of the delay and implementing an action plan to reduce it. Meeting this requirement helps PPB and the Oversight System ensure that any such investigative delays are

addressed through a structured process that identifies the cause and initiates timely remedial action to strengthen system performance.

PPB's self-monitoring plan for Paragraph 123 identifies four data sources: Overdue Case Memos (often referred to as 180-day memos), documentation of transmission to the DOJ and the Monitoring Team, an AIM data report of cases closed during the Reporting Period, and documentation tracking implementation of the action items developed from those reviews, including whether the identified actions had been completed, remained in progress, or were pending. There were 78 administrative investigations closed by PPB during this Reporting Period, and approximately 85 percent of them were completed within the 180-day timeline. The materials PPB provided to evidence its compliance with this paragraph identified the 12 administrative investigations completed during the Reporting Period that extended beyond 180 days after accounting for tolling periods, as well as a 180-day memo for each of those investigations.

Within the list of cases that were identified as having exceeded 180 days in duration, PPB indicated the following determinations: a review of the investigation timeline had been completed; the review included an explanation for the delay; the review included an action plan; and the review was sent to the DOJ and the Monitoring Team.[51] The Monitoring Team was provided with evidence demonstrating that each of the 12 180-day memos contained a clear and detailed description of the source(s) of delays in the associated investigation as well as an associated action plan for mitigating such delays, and that each was transmitted to the DOJ and the Monitor.

The Monitoring Team's review of materials relied on to demonstrate compliance with this paragraph identified several instances in which the date used in PPB's timeliness analysis did not appear to correspond precisely to the date a complaint was received or potential misconduct was discovered. In those instances, the date when IA received or was notified of the matter at issue was used by PPB for its calculations, even if it was after the date when the issue was first discovered by PPB. Importantly, none of the identified discrepancies would have resulted in any additional cases requiring the review described in Paragraph 123, which the Monitoring Team considered when conducting our evaluation of PPB's self-assessment of compliance with the paragraph. However, in order to ensure that compliance with this paragraph's requirements related to timeliness is maintained in the future, we believe it would be advisable for PPB to determine the date when a complaint is received or potential misconduct is discovered—instead of the date when IA received or was notified of such matters, if those dates do not happen to be the same—and to utilize that date to calculate the duration of the ensuing administrative investigation. We communicated this guidance to PPB after the close of the Reporting Period.

[51] The requirement for PPB or the Oversight System to provide these reviews to the Monitoring Team is the one provision from this paragraph that appears only in the current version of the Settlement Agreement (as opposed to previous versions); it was included in the City's report self-assessing compliance with the paragraph.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.**

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

With regard to the Investigation Timelines discrete section of the Settlement Agreement, the Monitoring Team's evaluation of PPB's compliance report found that the City has adequately demonstrated that it has maintained Substantial Compliance with all the paragraphs of this section that were included in previous versions of the Settlement Agreement.

The Monitoring Team's evaluation also found that the City could not demonstrate that it maintained Substantial Compliance with all the paragraphs of the Investigation Timelines discrete section that are included in the current version of the Settlement Agreement.

Paragraphs 128-129 and 131-133 (Conduct of IA Investigations)

The Settlement Agreement paragraphs in this discrete section include requirements, responsibilities, and/or other references to the Oversight System, which is defined in the Agreement as the combination of the Community Board for Police Accountability (CBPA) and the Office of Community-based Police Accountability (OCPA).[52] The Monitoring Team notes that neither part of the Oversight System was operational during this Reporting Period with respect to initiating, conducting, or adjudicating administrative investigations. The same paragraphs in previous versions of the Settlement Agreement—in effect prior to this Reporting Period—instead included requirements, responsibilities, and/or other references to the City, the Citizen Review Committee (CRC), the Police Review Board (PRB), and/or the Independent Police Review (IPR). With regard to Settlement Agreement provisions in this discrete section that reference the Oversight System, the City focused its self-monitoring plans on the language in the current version of the Agreement; in contrast, the City focused its associated compliance reports, as well as the materials it provided in support of evidencing compliance, on the language in previous versions of the Agreement. Based on the materials that were provided to us, the Monitoring Team evaluated the City's compliance with

[52] Unlike the other paragraphs in this discrete section, Paragraph 133 does not reference the Oversight System explicitly. It does, however, assign certain responsibilities to whichever "investigative entity" took certain actions; the Monitoring Team interprets the term "investigative entity" in this paragraph to include both PPB Internal Affairs and the Oversight System.

the provisions from previous versions of the Settlement Agreement. Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity for the City to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement.[53]

Paragraph 128

Paragraph 128 of the Settlement Agreement requires PPB's Internal Affairs Division (IA) and the Oversight System to collaborate in order to: determine which entity has jurisdiction over an administrative investigation into alleged misconduct on the part of a PPB member; and ensure redundant interviews by both entities do not occur. PPB's self-monitoring plan for Paragraph 128 restates these requirements in its Objective section. The plan includes as its data sources a memorandum regarding regular IA-IPR meetings, records of IA contacts and referrals, records of IPR referrals to IA, and an IA memorandum documenting the reason for any redundant interviews that did occur during the Reporting Period.

As supporting evidence for its assessment of compliance with this paragraph, PPB provided a memorandum reflecting that IA command staff and IPR leadership hold weekly in-person meetings to discuss case management, including jurisdiction, referrals, case progress, and interviews in an effort to reduce duplicative efforts and witness interviews. PPB also provided records documenting referrals between IA and IPR. In addition, PPB provided an IA memorandum identifying a single case during the Reporting Period in which both IPR and IA interviewed the complainant. The memorandum included an explanation for why each entity interviewed the same party in that case, which had been transferred to IA after initially starting at IPR. The second interview was conducted to ensure that all pertinent information had been provided, and it resulted in the identification of additional allegations. PPB's compliance report reflected this one case as including interviews by IA and IPR and noted the presence of the associated IA memorandum.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.**

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

[53] For additional commentary on the discrepancy between the City's self-monitoring efforts and the provisions of the Settlement Agreement that reference the Oversight System, see this report's section titled, "Work to be Completed; Anticipated Barriers to Substantial Compliance."

Paragraph 129

Paragraph 129 of the Settlement Agreement requires that all allegations of use of excessive force be subject to full and completed investigations resulting in findings, unless there is clear and convincing evidence that the allegation has no basis in fact, in which case the matter may be administratively closed. The paragraph further provides that a matter may be administratively closed if a full investigation is not feasible without additional information from the complainant and the complainant cannot be reached or refuses to participate, or if the involved officer cannot be identified after reasonable steps to do so. Additionally, the paragraph requires that, prior to administratively closing an investigation into alleged excessive force, the investigating entity must document the investigative efforts undertaken and explain why closure meets the paragraph's requirements.

PPB's self-monitoring plan for Paragraph 129 includes amongst its data sources a Use of Force Cases Report from IA and a review of administratively closed use of force cases conducted by a Subject Matter Expert (SME). The plan's methodology calls for demonstrating that all excessive force allegations were administratively closed for one of the reasons contemplated by this paragraph, as verified by the SME, or that they resulted in findings. The revised methodology also calls for comparing the SME review of administratively closed cases with the underlying case files. The Use of Force Cases Report showed that 43 use of force investigations were closed during the Reporting Period. One of those investigations included two findings, resulting in 44 findings in total.[54]

PPB reported that 19 of the investigations were administratively closed based on IPR's determination that there was clear and convincing evidence showing that the excessive force allegation had no basis in fact, as contemplated by Paragraph 129. PPB further reported that no investigations were administratively closed because the complainant could not be reached or because the involved officer could not be identified. PPB's compliance report reflects that all 19 investigations administratively closed based on clear and convincing evidence had a corresponding case file and SME review.

The Monitoring Team identified one limitation in PPB's self-monitoring assessment. Paragraph 129 requires that the investigating entity document the investigative efforts undertaken and explain why closure meets the paragraph's requirements prior to administratively closing the matter. Although PPB's self-monitoring assessment compared the SME reviews with the underlying case files, it did not expressly verify that the required documentation was completed before administrative closure. The Monitoring Team considers this to be an oversight in the self-monitoring process, but not one sufficient to undermine PPB's overall demonstration of compliance with Paragraph 129.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained**

[54] The total number of findings exceeds the number of investigations because one investigation included two findings.

Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

Paragraph 131

This paragraph of the Settlement Agreement requires that the City adopt an Oversight System to perform administrative investigations for matters under its jurisdiction, make findings and conclusions on administrative complaints under their jurisdiction, and impose corrective action as applicable under any binding disciplinary rules. PPB's self-monitoring plan for Paragraph 131 identifies its objective as demonstrating that the City adopted such an Oversight System.

PPB's self-monitoring plan includes amongst its data sources: multiple different records associated with hearings of the Police Review Board (PRB); PPB directives, City Codes, and City Council materials that apply to the PRB and/or the Citizen Review Committee (CRC); and internal PPB communications regarding offers of stipulated discipline associated with an administrative investigation, membership on the PRB and CRC, and appeals of administrative findings to the CRC.

Notably, the data sources also include the contents of Paragraph 131 in a previous version of the Settlement Agreement, which was not in effect during this Reporting Period. As is explained in PPB's compliance report, it is compliance with that previous language that PPB assessed, as opposed to compliance with the language currently in effect. This is because the Oversight System described in the current Settlement Agreement was not yet established during the Reporting Period. The Monitoring Team's evaluation of PPB's self-assessment focused, accordingly, on the evidence that was provided and the conclusions that were reached based on that evidence.

The provisions of the previous Settlement Agreement with which PPB demonstrated its compliance include a series of requirements regarding the following aspects of PRB procedures: 1) composition of PRB reviews of use of force cases; 2) rotation protocol for Citizen Review Committee (CRC) members participating on the PRB; 3) confidentiality requirements, as well as requirements for each PRB member's ability to make appropriate recommendations to the Chief of Police; 4) eligibility for cases in which the member elects to accept investigative findings and discipline; 5) qualifications for all community members who participate on the PRB; 6) authority to remove PRB members and CRC members who serve on the PRB; 7) unaffected status of CRC membership in case of removal from participation on the PRB; 8) duration of service of CRC members serving on the PRB; and 9) recusal of CRC members during appeals of cases for which they participated on the PRB.

PPB provided a thorough, detailed, and organized set of materials that addressed all of the above requirements and demonstrated compliance with them. The materials included documentation regarding all 21 PRBs conducted during the Reporting Period, including records addressing quorum, confidentiality requirements, and community member participation and rotation. PPB further reported that no new community members were added or removed, no removal of a community member was recommended, no stipulated discipline requests occurred, and no appeals occurred during the Reporting Period. PPB's compliance report identified one CRC member whose stated term had expired without documentation of formal Council reappointment; however, City Code provides that a committee member continues to serve until reappointed or replaced, and the report determined that the member remained eligible to serve.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.**

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

Paragraph 132

This paragraph of the Settlement Agreement dictates that a majority vote of a panel of three or more CBPA members may return administrative investigations into misconduct by PPB sworn members that fall within the jurisdiction of the Oversight System to the OCPA investigator for further investigation. The paragraph further requires reasonable attempts by the investigating entity to conduct the additional investigation within 10 business days, or else provide a written statement to the CBPA explaining why additional time is needed.

PPB's self-monitoring plan for Paragraph 132 identifies its objective as demonstrating whether attempts to conduct additional investigation or obtain additional information were made within 10 business days or were accompanied by a required written explanation that was sent to the CBPA. The plan lists as data sources a PRB Facilitator declaration, any communications regarding the reinitiation of a case, and PRB facilitator memoranda to the Chief of Police. Its testing methodology calls for verifying such communications as well as whether any needed further investigation was conducted within the required timeframe or accompanied by a required written explanation that was provided to the CBPA.

The PRB Facilitator declaration and memoranda to the Chief of Police for the 21 PRBs conducted during the Reporting Period affirmed that no requests for further investigation had been made by

any PRBs with respect to the cases reviewed by those PRBs. Because no investigations were returned for additional investigation, the requirement to make reasonable attempts to conduct the additional investigation within 10 business days or provide a written statement explaining why additional time was needed was not applicable during this Reporting Period.

PPB's compliance report concluded that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance with the provisions of this paragraph that were included in previous versions of the Settlement Agreement.**

Because the Oversight System was not yet operational by the end of the Reporting Period, there was no opportunity to demonstrate compliance with the provisions of this paragraph that are included in the current version of the Settlement Agreement. **Therefore, the Monitoring Team's evaluation also determined that the City could not demonstrate Substantial Compliance with the current version of this paragraph.**

Paragraph 133

According to Paragraph 133 of the Settlement Agreement, if an identified PPB officer's use of force gives rise to a finding of liability in a civil trial, the City must complete a series of tasks in response (some of which are conditional). These tasks include: 1) ensuring PPB enters the civil liability finding in EIS; 2) reevaluating the officer's fitness to participate in all current and prospective specialized units; 3) conducting a full investigation into the allegation of misconduct if no such investigation has previously been conducted; 4) if an investigation has already concluded based upon the same allegation of misconduct, but it has failed to reach a sustained finding, identifying whether any new evidence exists in the record of the civil trial to justify reopening the investigation and, if so, reinitiating the investigation; and 5) if the previous entry in this list of tasks occurred, and if no new evidence from the civil trial justifies reopening the investigation, working to identify the reason why the administrative finding was contrary to the civil trial finding and publishing a summary of the results of the inquiry.

PPB's self-monitoring plan for Paragraph 133 identifies as its data sources a Liability Manager memorandum as well as Internal Affairs SOPs 19 and 32. SOP 19 establishes guidelines for assigning administrative investigations referred to IA by IPR or received from PPB members or the public, while SOP 32 establishes procedures for reviewing tort claims and lawsuits for potential policy violations, including the steps required if an officer's use of force results in a finding of liability in a civil trial. The self-monitoring plan's methodology calls for verifying, in cases where the use of force gave rise to a finding of liability in a civil trial, that the civil liability finding was entered in EIS, that the involved officer's fitness was reevaluated, and that any required investigation, reopening determination, or published summary was completed.

A memorandum to the Commander of the Professional Standards Division reported that, based on a review of Police Liability Management trial lists and consultation with the City Attorney's Office, no PPB officer's use of force gave rise to a finding of liability in a civil trial during the Reporting Period. There were no trials during Q1–Q2 2026 and, therefore, PPB reported that the follow-up requirements of Paragraph 133 were not applicable for this Reporting Period.

PPB's compliance report found that Substantial Compliance was achieved for this Reporting Period. **The Monitoring Team's evaluation determined that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

With regard to the Conduct of Investigations discrete section of the Settlement Agreement, the Monitoring Team's evaluation of PPB's compliance report found that the City has adequately demonstrated that it has maintained Substantial Compliance with all the paragraphs of this section that were included in previous versions of the Settlement Agreement.

The Monitoring Team's evaluation also found that the City could not demonstrate that it maintained Substantial Compliance with all the paragraphs of the Conduct of Investigations discrete section that are included in the current version of the Settlement Agreement.

Paragraphs 148, 150, and 193 (PPB Stops Data and Annual Reports)

Paragraph 148

This paragraph of the Settlement Agreement requires continued documentation by PPB officers of demographic data regarding the subjects of police encounters, the provision of such information to the Portland Committee on Community Engaged Policing (PCCEP), and the making of such information available to the public. It further requires PPB to consider enhancements to its data collection efforts and to report on efforts made toward such enhancements to the DOJ on a quarterly basis.

With regard to PPB's internal requirement for officers to collect demographic data of subjects whom they stop, PPB provided Directive 0900.00 General Reporting Guidelines, which includes such a requirement in the form of the Stops Data Collection Report. Relatedly, PPB provided a template of a form titled, "Demographic Collection form", which is equipped to gather all of the demographic data elements required by this paragraph. Regarding the collected data itself, PPB's Stops Data Collection 2025 Annual Report was also provided, and it demonstrates the performance in actual practice of Paragraph 148's data collection requirements.

With respect to the Settlement Agreement's requirement for PPB to share the demographic data it collects about stops with PCCEP, PPB provided an email exchange with PCCEP staff indicating the transmission of the Stops Data Collection 2025 Annual Report (from PPB to PCCEP) during the Reporting Period. PPB also provided a screenshot from the City's website to demonstrate the public availability of its annual stops report.[55] Finally, PPB provided inter-office memoranda indicating that consideration was given to the enhancement of its data collection efforts, as required by this paragraph, in both Q4 2025 and Q1 2026.[56] Relatedly, emails indicating transmission of these memoranda (one from each quarter of the Reporting Period) to the DOJ were also supplied as evidence of PPB's compliance with Paragraph 148.

PPB's compliance report references Section 1.2.1.7 of Directive 0900.00 General Reporting Guidelines as its requirement for officers to collect demographic data, as contemplated by this paragraph of the Settlement Agreement. The compliance report indicates that the required data was compiled in PPB's Stops Data Collection 2025 Annual Report;[57] it further indicates that the annual report was provided to PCCEP and made available to the public. Finally, the compliance report indicates that data collection enhancements regarding Q4 2025 and Q1 2026 were considered and reported to the DOJ by PPB.[58]

PPB's compliance report concluded that PPB was in Substantial Compliance with Paragraph 148 for this Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

Paragraph 150

PPB is required by this paragraph to issue a publicly available annual report, including a summary of its problem-solving and community policing activities. PPB must share a draft of the report with PCCEP before its finalization and release to the public; and, once it is released, PPB must hold at least one meeting annually in each precinct area to present the report, in addition to presenting it at a

[55] The screenshot was undated. The Monitoring Team notes, however, that the report itself is dated June 26, 2026, and that it remains publicly available via the City's website as of this writing.

[56] It was determined, in each of those quarters, that "no enhancements were needed in the current Reporting Period to comply with race, age, sex, and perceived mental health data collection requirements."

[57] PPB's compliance report also referenced its Q4 2025 and Q1 2026 Stops Data Collection Quarterly Reports and indicated that they include data on the age and sex of subjects who were stopped by PPB. This appears to be inaccurate. Although the compliance report should be corrected, this inaccuracy—which was similarly pointed out by the Monitoring Team in our previous evaluation of PPB's efforts at self-monitoring its compliance with Paragraph 148—does not amount to a deviation from the specific requirements of Paragraph 148.

[58] Although the compliance report does not explicitly confirm that the data collection enhancement reports were provided to DOJ on a quarterly basis, evidence provided by PPB does confirm this cadence.

City Council meeting. The presentations must focus on, among other things, PPB's efforts in community policing in regard to the use of force, as well as PPB's policies and laws governing pedestrian stops, stops and detentions, and biased-free [sic] policing, including a civilian's responsibilities and freedoms during such encounters. PPB's self-monitoring plan for assessing compliance with Paragraph 150 included a review of the PPB Annual Report, relevant correspondence with PCCEP, and recordings of relevant precinct meetings and City Council sessions, all in order to verify that each requirement in the paragraph was met. The plan included conducting an evaluation to ensure the coverage of required topics during PPB's presentation of the annual report at each Precinct Meeting as well as the City Council Meeting in which the report was presented.

PPB's review confirmed the publication of its 2025 Annual Report to the City's website on June 2, 2026.[59] The review also confirmed that the report addressed PPB's problem-solving and community policing efforts, as required. Additionally, and in reliance on an email exchange between PPB and PCCEP staff, which indicated the transmission of a draft of the report from the former to the latter, PPB confirmed the provision of the report to PCCEP on May 18, 2026—prior to its publishing on the City's website.[60]

With respect to Paragraph 150's requirement that PPB present the report, including certain specified topics, in each precinct area as well as at a City Council meeting, PPB's review of a recording from the East Precinct Annual Report Meeting (which, according to the City's website, occurred on June 10, 2026) verified that the annual report was indeed presented there, and that the presentation addressed community policing, pedestrian stops, stops and detentions, and biased-free [sic] policing. PPB reported that no presentations of its annual report had been given in either Central Precinct or North Precinct, or to the City Council, as of the end of the Reporting Period. Crucially, PPB's self-assessment referenced Paragraph 193 of the Settlement Agreement, which explicitly cross-references Paragraph 150. Paragraph 193 indicates, among other things, that PPB shall hold "the required precinct meetings" no later than September 20 of each year; this deadline falls outside of the Reporting Period being assessed, which ended on June 30, 2026.

[59] Although PPB did not supply any evidence specifically confirming this date, it is listed on the City's website as the "Published" date of the report (in addition to an "Updated" date of June 16, 2026).

[60] May 18, 2026, matches the date of a reply email sent to PPB from PCCEP staff confirming the latter's receipt of PPB's 2025 Annual Report. The date of the initial email from PPB, indicating transmission of the report to PCCEP, was May 13, 2026. Regardless of which date is relied on to confirm adherence to Paragraph 150's requirement that the annual report be provided to PCCEP for review and comment prior to finalization and public release, there is no indication in PPB's self-assessment of compliance with this paragraph as to whether PCCEP produced any comments on the draft annual report it had received during the Reporting Period; there is also no specification in Paragraph 150 as to any set amount of time PCCEP must be given to do so.

PPB's compliance report concluded that PPB was in Substantial Compliance with Paragraph 150 for this Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

Paragraph 193

Paragraph 193 of the Settlement Agreement requires PPB to release annual reports prior to September 20 of each calendar year. It further requires PPB to hold at least one meeting in each geographic precinct to present the report prior to that date.[61] PPB's self-monitoring plan called for a review of the 2025 Annual Report to verify that its publishing date was prior to the indicated deadline; similarly, the plan called for a review of recordings of each required precinct meeting to verify that they were held prior to the same deadline.[62]

PPB's review found that the 2025 Annual Report was indeed released to the public prior to the annual deadline of September 20 set forth in Paragraph 193; specifically, it was published on the City's website on June 2, 2026. With respect to the precinct meetings referenced in the paragraph, PPB's review determined that one was held in East Precinct prior to the deadline, on June 10, 2026, and that none had been held in either Central or North Precincts as of the end of the Reporting Period on June 30, 2026. Based on these findings, PPB's compliance report concluded that PPB was in Substantial Compliance with Paragraph 193 for this Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

With regard to the PPB Stops Data and Annual Reports discrete section of the Settlement Agreement, the Monitoring Team's evaluation of PPB's compliance report found that the City has adequately demonstrated that it has maintained Substantial Compliance with the section.

<u>Paragraph 189 (Outside Review of 2020 Protest Response)</u>

Paragraph 189

The City's self-monitoring plan for this paragraph of the Settlement Agreement aimed to verify that the City completed three primary requirements (in sum): 1) the provision of funding for an outside entity to evaluate the City's response to crowd control events in 2020 and to prepare a follow-on review of the City's response to the evaluation; 2) the use of the evaluation to prepare a training

[61] Additional requirements surrounding PPB's Annual Reports and their presentations to the community are included in Paragraph 150 of the Settlement Agreement.

[62] The self-monitoring plan also discussed the timing of PPB's presentation of its Annual Report to City Council, which is a requirement in Paragraph 150 of the Settlement Agreement; this requirement is not addressed in Paragraph 193, however.

needs assessment; and 3) the completion of requirements #1 and #2 consistent with a scope of work agreed upon by the City and the DOJ. In order to demonstrate its completion of these requirements, the City provided documentation of City Council's authorization of funding for an independent evaluation and a follow-on review, as described in the Settlement Agreement; the independent evaluation itself, a completed training needs assessment pertaining to its recommendations, and the follow-on review;[63] and the contract entered into with an outside entity, which includes the scope of work that addressed both the independent review and the training needs assessment.

The City's compliance report concluded that it was in Substantial Compliance with Paragraph 189 for this Reporting Period. **The Monitoring Team's evaluation found that the City has maintained Substantial Compliance in accordance with the self-monitoring plan for this paragraph of the Settlement Agreement.**

With regard to the Outside Review of 2020 Protest Response discrete section of the Settlement Agreement, the Monitoring Team's evaluation of the City's compliance report found that the City has adequately demonstrated that it has maintained Substantial Compliance with the section.

[63] PPB's self-monitoring plan appeared to inadvertently identify the independent evaluation twice within its list of Data Sources, and it appeared to inadvertently omit the follow-on review from that list. However, the materials provided by PPB to evidence its compliance with this paragraph included both reports.

Terminated Discrete Sections[64]

Pursuant to the Settlement Agreement, and since the Monitoring Team's last semi-annual compliance report, the following paragraphs (which the Settlement Agreement groups into "discrete sections" as indicated) have been terminated:

- 66-67 (force principles)
- 78-79, 81, 84, and 190 (training principles)
- 115 (crisis triage)
- 124-127 (on-scene public safety statements and interviews)
- 137 and 245 (discipline and accountability)[65]

Paragraphs 66-67 (Force Principles)
This discrete section was terminated on August 4, 2026, in accordance with Paragraph 257 of the Settlement Agreement.

Paragraphs 78-79, 81, 84, and 190 (Training Principles)
This discrete section was terminated on August 4, 2026, in accordance with Paragraph 257 of the Settlement Agreement.

Paragraph 115 (Crisis Triage)
This discrete section was terminated on August 4, 2026, in accordance with Paragraph 257 of the Settlement Agreement.

Paragraphs 124-127 (On-Scene Public Safety Statements and Interviews)
This discrete section was terminated on August 4, 2026, in accordance with Paragraph 257 of the Settlement Agreement.

Paragraphs 137 and 245 (Discipline and Accountability)
This discrete section was terminated on September 15, 2026, in accordance with Paragraph 259 of the Settlement Agreement.

[64] According to Paragraph 251 of the Settlement Agreement, "A discrete section that is terminated is no longer subject to enforcement, monitoring, or self-monitoring, and the requirements under the discrete section are no longer part of this Agreement." For a full description of partial termination of the Agreement, including how discrete sections become subject to termination, see Paragraphs 249-259 of the Settlement Agreement.

[65] As is further explained in the Monitoring Team's previous compliance reports (all of which are available here: portlandpolicemonitor.com/documents/), Paragraph 245 was not included in either our compliance assessments or our evaluations of the City's self-monitoring efforts.

Outcome Measurements

Introduction

Paragraph 222 of the Settlement Agreement calls on the Monitoring Team to conduct semi-annual qualitative and quantitative outcome assessments to measure whether implementation of the Agreement has created each of five intended outcomes:[66]

1. Capable systems and resources for responding to persons in mental health crisis;
2. Competent accountability and oversight systems;
3. Effective training for police officers that increases the knowledge, skills, and abilities necessary for effective and successful delivery of service to persons in mental health crisis;
4. Proper management of the use of force to meet constitutional standards; and
5. Robust systems of community engagement.

The Monitoring Team recognizes that policing is quite often dynamic in nature and does not easily lend itself to simple or immutable standards that amount to a singular definition of success. Keeping this in mind, we approach these assessments with the goal of utilizing qualitative and quantitative data to help reflect the specific ways in which PPB is achieving the intended outcomes of the Settlement Agreement while also identifying areas where opportunity for improvement remains.

Outcome Assessments Addressed in This Report

In addition to renewing our focus on examining PPB's uses of force, as we did in our previous compliance report, this report focuses on metrics associated with responding to persons in mental health crisis, effective training for officers, and systems of community engagement. Our report expands on our previous analysis of the use of force to assess whether changes in the contexts of force incidents might be associated with an increase in Category III Force when all other categories are either stable or declining. Our report presents data on trends in interactions between PPB officers and individuals with mental health concerns, including PPB's utilization of Enhanced Crisis Intervention Teams and Behavioral Health Response Teams. It also presents data on the disposition of calls for service with subjects in actual or perceived mental health crisis. We present data on trends in PPB's training of officers, including the types of trainings offered, numbers of members trained, and Training Division's response to potential training and policy issues raised by the Force Inspector's Feedback Loop process. Finally, our report presents data on the City's and PPB's efforts to engage with the community, including perceptions from members of the public about such efforts that were collected through a community survey.

[66] Paragraph 222 sets forth 26 metrics, spread across five categories (use of force data; mental health interaction data; training data; performance data; and accountability data), that will inform the outcome assessments.

Data Sources

The Monitoring Team continues to work with PPB to identify and obtain the relevant data necessary for the outcome assessments required by Paragraph 222 in the Settlement Agreement. The Monitoring Team's data request included data going back to the period of time prior to the initiation of the Agreement (e.g. 2013). For some data sources, PPB was indeed able to provide reliable data going that far back in time. Unsurprisingly (and appropriately), however, between 2013 and 2026, PPB also implemented multiple changes to their information technology systems, Directives and Standard Operating Procedures, data capture forms, and data measurement definitions, improving the breadth of available data while also balancing the resources required to collect and analyze it. These types of changes generally represent progress and growth by an agency and are therefore laudable. They do also naturally result in an uneven data landscape in which the data for more recent periods are more detailed, reliable, and accessible through standard data analysis tools than data from less recent periods—including, in this case, those closer to the initiation of the Settlement Agreement. The lack of metrics captured as far back as the beginning of the Settlement Agreement is important in that our analysis cannot speak to patterns of performance prior to the data we have available for the analysis. It is possible, for instance, that the observed metrics may have exhibited significant improvements prior to the beginning of the available data.

PPB provided the Monitoring Team with data related to the use of force, interactions with persons with mental health concerns, training, and community engagement. These data sources will be described in greater detail in the corresponding sections of our outcome assessments. Specifically with regard to community engagement data, the Monitoring Team utilized a public survey to gather both qualitative and quantitative information. We combined the results of this survey with our own observations and the information provided by PPB in our outcome measurement.

With regard to use of force data, the Monitoring Team also relied on PPB's Open Data portal online[67] for updated data on non-lethal force events. The portal consists of a data set in which each row of data represents an interaction between a single PPB member and a single subject, during which multiple applications of force may have been used. Thus, if multiple members use force against one subject, or one PPB member uses force against multiple subjects, there will be multiple rows in the data set to represent the complete force event.

PPB's open data includes information about the number of applications of force, the type of force used, resistance by the subject, the subject's demographics, whether the subject was experiencing a mental health crisis (actual or perceived), whether the subject was under the influence of drugs or alcohol, any subject weapon(s), the initial call category, the officer's tenure, the officer's precinct

[67] The PPB Open Data portal is comprised of multiple interactive dashboards addressing multiple policing topics such as crime statistics, staffing numbers, arrest statistics, use of force data, deadly force incidents, stops data, precinct demographics, and bias crime statistics.

assignment at the time of the force event, the type of call (self-initiated by PPB or dispatched), and the year, month, and time of day of the force event. The Monitoring Team expanded on the use of force data examined in our last report by including data on deadly force use, in-custody deaths, and deaths resulting from a member's use of force—collectively referred to as Category I force.

Metrics Associated with Management of the Use of Force

Officer-Involved Shootings (OISs)

PPB provides limited data on OIS cases on their data portal.[68] Between 2010 and 2020, the number of these deadly force events swung between two and six annually.[69] This escalated to 8 events in 2021 and 9 events in 2022, before dropping to 1 event in 2025. Of these deadly force events, the number of fatal injuries ranged between one and four from 2010 through 2018, before peaking at 5 in 2019, and then dropping back down to a range between 0 and 4 from 2020 through 2025.

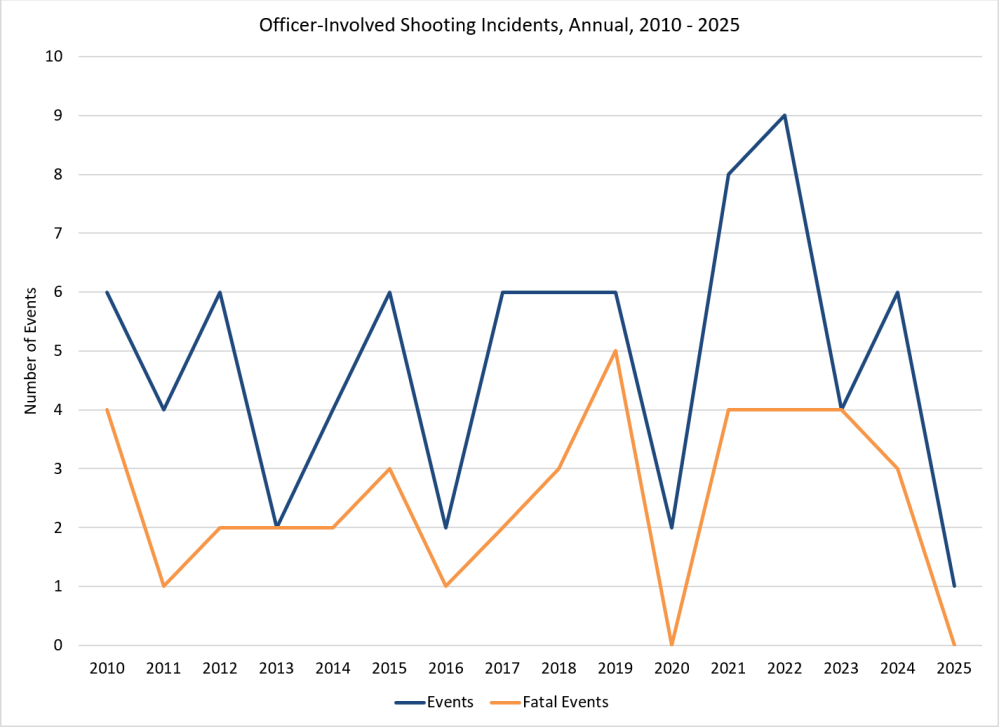
When comparing the first half of the trend to the second half, the average annual number of OISs was highly consistent: 4.7 events between 2010 and 2018, and 4.6 events between 2019 and 2025. The pattern for fatal injuries demonstrated a small increase, with an annual average of 2.2 between 2010 and 2018, and 2.6 between 2019 and 2025. However, statistical testing of the data did not identify any significant trends in the annual count of either deadly force events or fatalities.[70]

The Monitoring Team's analysis of OIS trends and fatalities did not find evidence of a statistically significant trend over the 16 years of data we reviewed. However, the analysis is based on a relatively small number of observations and small annual counts. Future outcome assessments should replicate this analysis as more data becomes available to identify any changes in performance.

[68] The PPB open data site also includes brief case summaries of two in-custody deaths occurring between 2010 and 2025. The detailed data for these cases, however, is not included in the interactive dashboard data about OISs available for download.

[69] The quantity of these deadly force events, as well as the number of fatalities, are small in any given year, introducing a great deal of noise into a quarterly measurement. Therefore, the Monitoring Team chose to measure these cases on an annual basis to improve interpretability.

[70] Statistical testing included using a Poisson-based regression model to test the significance of a linear trend component in the data. However, given the small counts involved, and the variable number of deadly force events from one year to the next, a small-sample permutation analysis was performed to test whether the data exhibit a systematic trend. The small-sample permutation analysis fits a trend line to the observed data, then compares the slope of that trend line to the slopes of trends found when randomly reordering the data points. If a trend is present in the observed data, the randomly reordered data points should produce a statistically different trend line slope (on average) than the observed slope. The exact p-value for the permutation test on the fatality rate, given the number of deadly force events, was 0.783; and the exact p-value for the permutation test on the number of deadly force events was 0.901. Both results indicate no statistical evidence of a linear trend in the data.

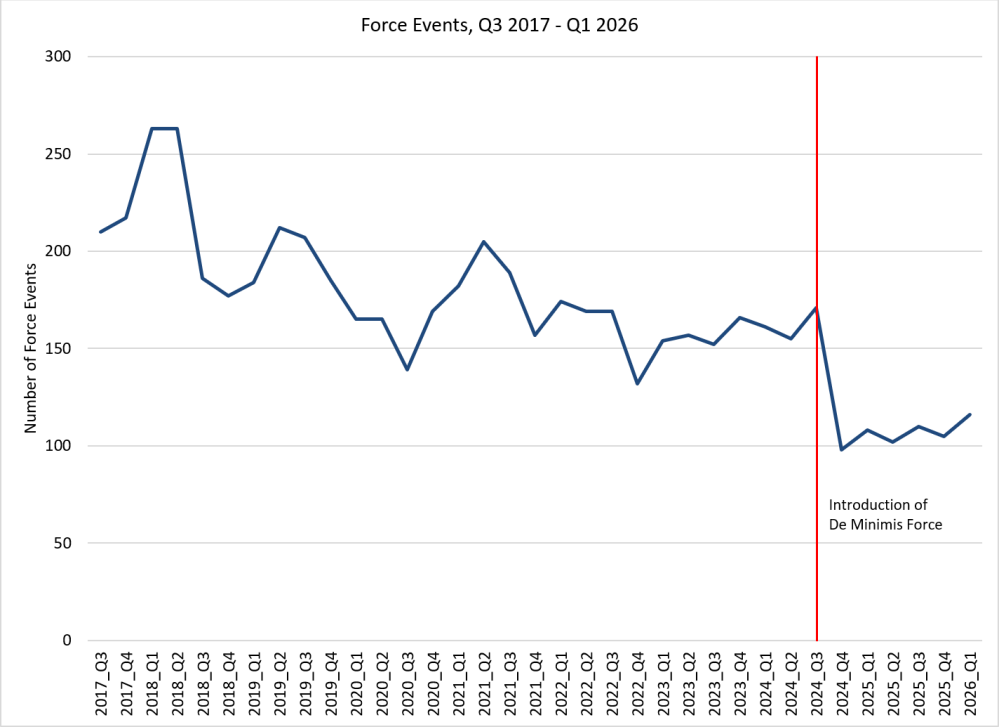


Non-Deadly Force Events

During Q4 2025 and Q1 2026, the newest periods of data available since the Monitoring Team's last outcome assessment, force events continued trending slightly upward. The average quarterly number of force events rose from 105—between Q4 2024 and Q3 2025—to 108—between Q2 2025 and Q1 2026. However, the total number of force events remains well below historical levels due to both a downward trend in force events overall and the introduction of De Minimis force in Q3 2024. De Minimis force does not have the same reporting requirements as more serious uses of force, thereby reducing the number of total force events reported after this change.[71]

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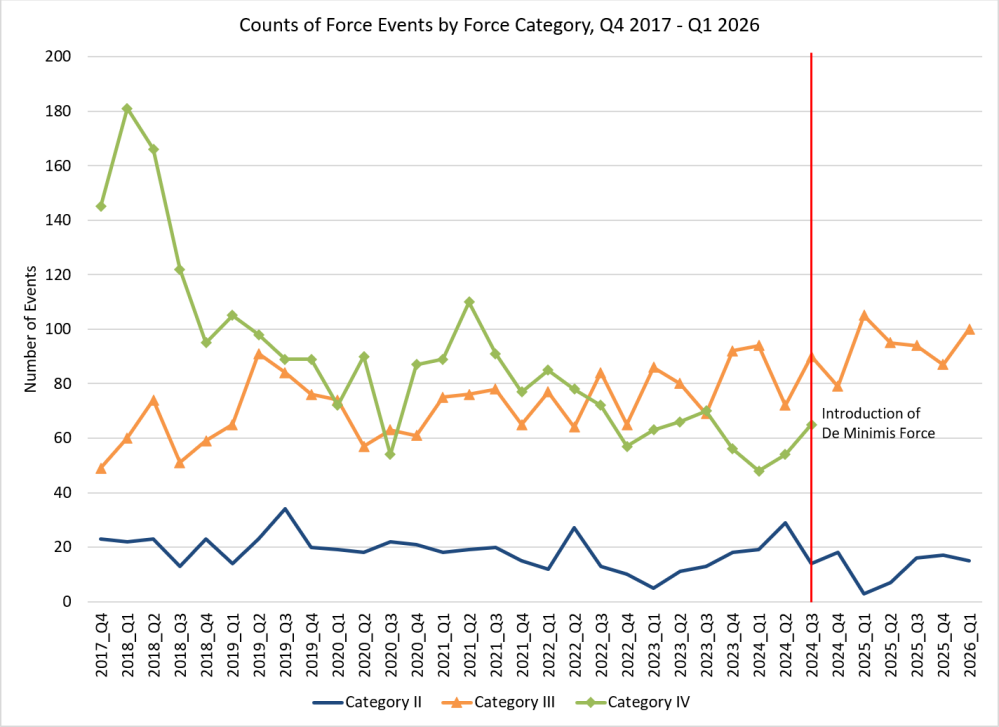
[71] These uses of force must be reported on a General Offense (GO) form, unless the application of force causes an injury to the subject or the subject complains of an injury. However, the data reported in PPB's open data are based on applications of force reported on the Force Data Collection Report (FDCR), which excludes De Minimis force applications.



Categories of Force

When total force events are decomposed by the highest category of force used, Category III force events remain the largest share. Between Q2 2025 and Q1 2026, there was a quarterly average of 94 Category III force events compared to a quarterly average of 13.8 Category II force events, a ratio of 6.8:1. Both Category II and III force events appear to be continuing their historical trends of decreasing and increasing, respectively.

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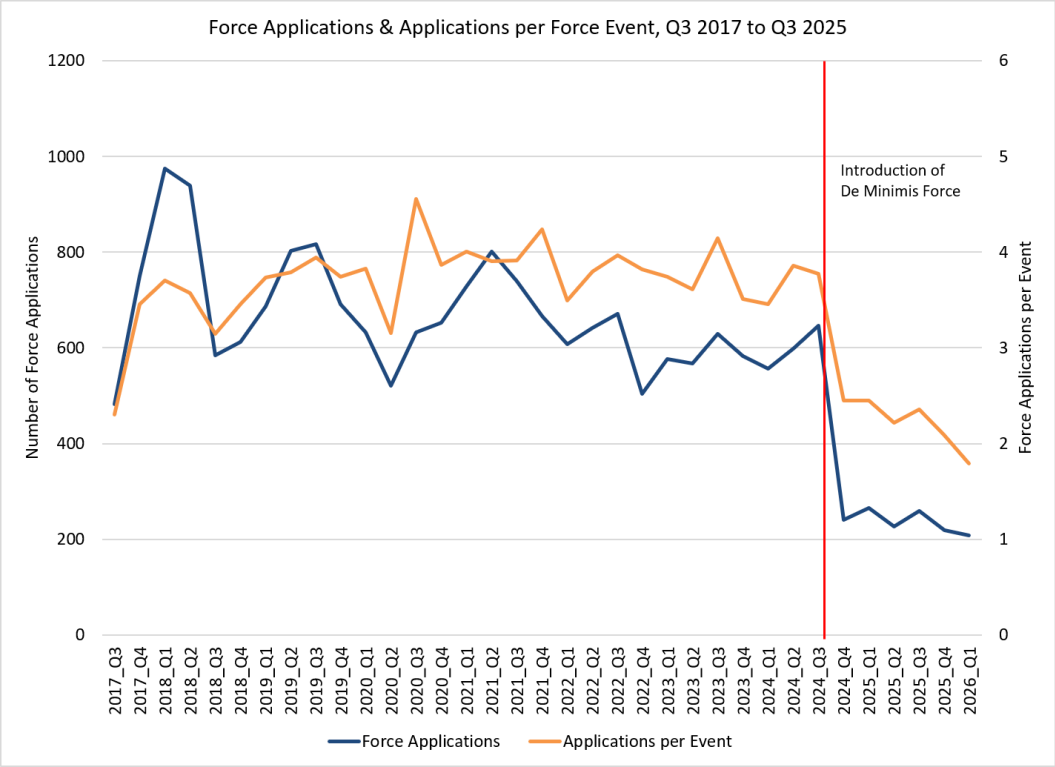


Force Applications

Applications of force have continued on a downward trajectory since the introduction of De Minimis force. Between Q2 2025 and Q1 2026, the quarterly average number of force applications was 228, a reduction of 19.5 applications from the quarterly average of 247.5 between Q4 2024 and Q3 2025.

A similar pattern is observed for applications of force per event. Between Q2 2025 and Q1 2026, the quarterly average number of force applications per event was 2.11, a 9.4 percent reduction from the quarterly average of 2.33 between Q4 2024 and Q3 2025.

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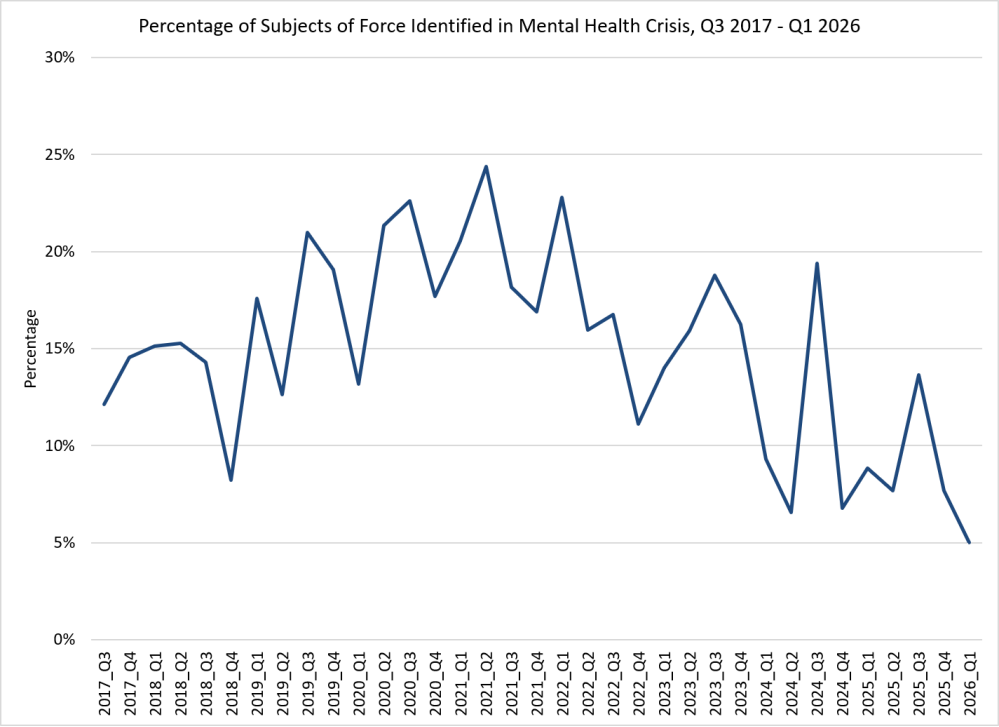


Subjects in Mental Health Crisis

The percentage of subjects of force identified as experiencing an actual or perceived mental health crisis dropped to its lowest point in Q1 2026 at 5.0 percent, with a quarterly average of 8.5% between Q2 2025 and Q1 2026. In comparison, the period with the highest percentage of subjects experiencing a mental health crisis was 24.4 percent in Q2 2021 (3.9 times higher than in Q1 2026), and the 2021 quarterly average was 20.0% (1.4 times higher than in Q2 2025 through Q1 2026).

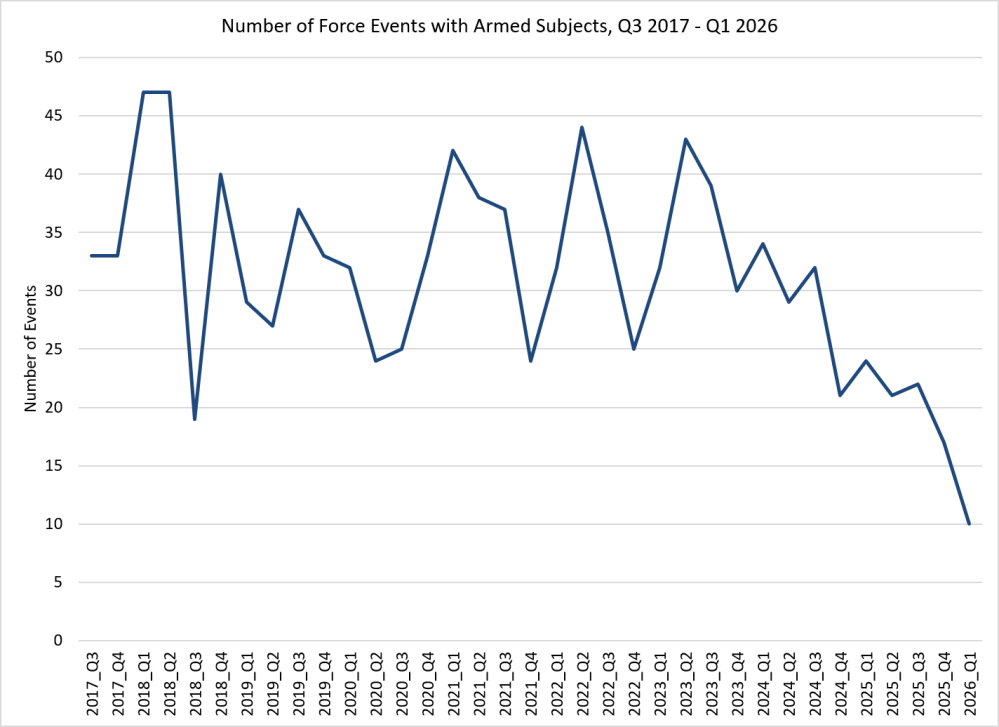
While the percentage of subjects of force in mental health crisis increased between 2017 and 2021, that trend has reversed since. When this percentage was at its peak in Q2 2021, PPB used force against 48 subjects in actual or perceived mental health crisis. In Q1 2026, the number was 6.

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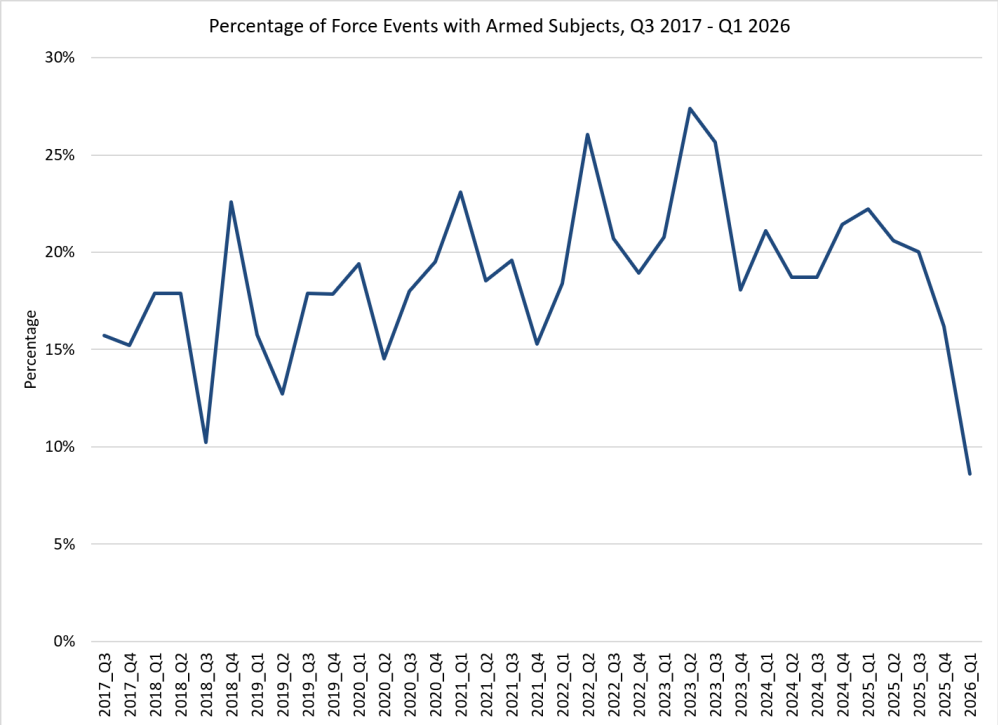
Armed Subjects

For this report, the Monitoring Team sought to expand our outcome assessments beyond those in our previous report by exploring the context of PPB encounters with the public that result in force events. One factor of interest is how often force events involved armed subjects.



The publicly available data from PPB's open data portal illustrates that the number of force events involving armed subjects varied between 20 and 45 for most years between Q3 2017 and Q4 2023. Beginning in 2024 and continuing through 2025, there was a marked decline in the number of force events involving armed subjects.

As shown previously, the total number of force events has been declining over the past eight years. The combination of fewer armed subjects and total number of force events results in a lower percentage of force events involving armed subjects over time, as shown below. Notably, there is a marked decline in armed subjects in 2024 and 2025, with armed subjects in force events decreasing from 22.2 percent in Q1 2025 to 8.6 percent in Q1 2026—a 61.3 percent decline.

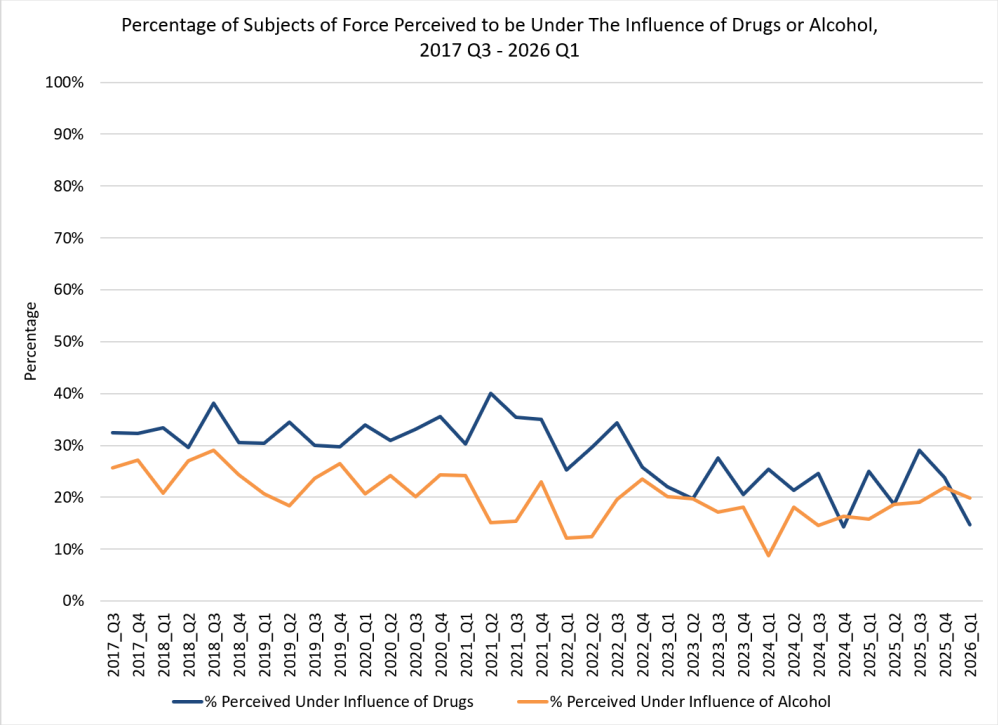


Subjects Perceived to be Under the Influence of Drugs or Alcohol

The Monitoring Team performed a similar analysis to examine the percentage of subjects of force perceived by PPB to be under the influence of drugs or alcohol. Between Q3 2017 and Q2 2018, the quarterly average number of subjects perceived to be under the influence of drugs was 76, and the quarterly average perceived to be under the influence of alcohol was 59.8. Between Q2 2025 and Q1 2026, those same quarterly averages had fallen to 23.3 with respect to drugs (a 69.3 percent decline), and 21.5 with respect to alcohol (a 64.0 percent decline).

The reduction in the numbers of subjects perceived to be under the influence of drugs or alcohol was large enough during this time frame that the percentage of subjects of force perceived as under the influence also dropped. The quarterly average percentage of subjects perceived to be under the

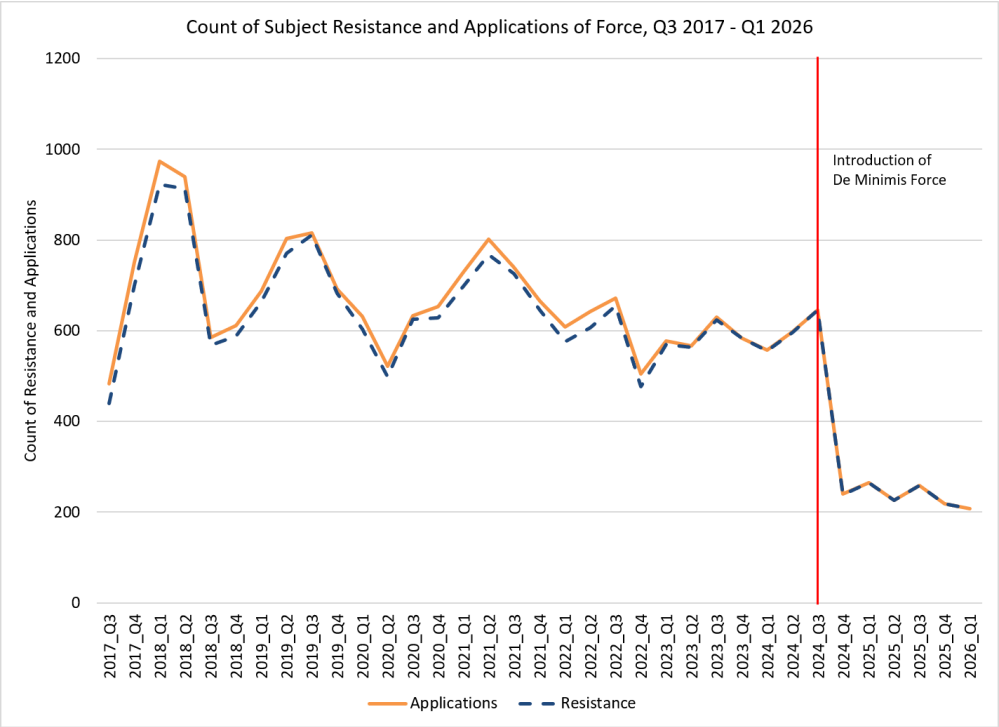
influence of drugs dropped from 31.9 percent between Q3 2017 and Q2 2018 to 21.5 percent between Q2 2025 and Q1 2026 (a 32.6 percent decline). Regarding subjects perceived to be under the influence of alcohol, the corresponding share dropped from 25.2 percent between Q3 2017 and Q2 2018 to 19.9 percent between Q2 2025 and Q1 2026 (a 21.0 percent decline).



Subject Resistance

The data on subject resistance are collected by PPB at the same time they collect data on applications of force. Members are required to perform a decision-point analysis and report on the subject's resistance that precipitated each application of force. Members are also trained to reassess subject resistance for each subsequent application of force, adjusting the severity of force to a level commensurate with the subject's level of resistance. It is therefore unsurprising that the number of reports of active resistance by subjects is nearly identical to the number of applications of force contained in the data, and that those numbers have generally been declining over the entire period reviewed by the Monitoring Team.[72] To maximize potential lessons that may be learned from data on subject resistance, the Monitoring Team encourages PPB to consider methods of identifying such resistance that are independent of force reporting by members (e.g. body-worn camera recordings, for instance).

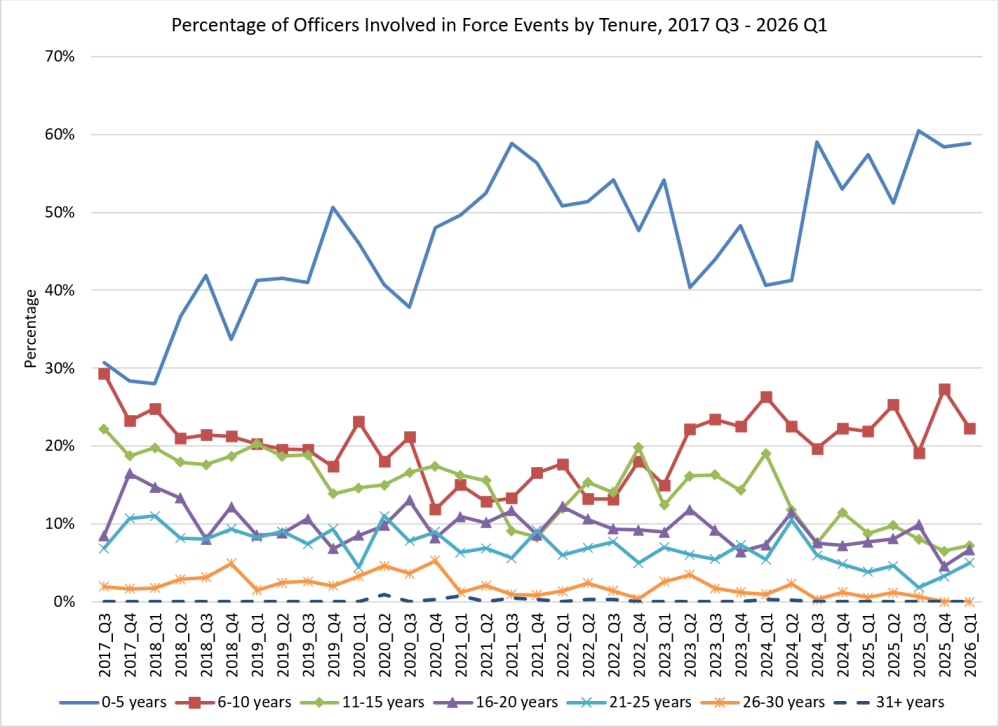
[72] PPB's data includes the classification of "aggressive resistance" until Q1 2023, the classification of "deadly resistance" until Q4 2018, and the classification of "active resistance" throughout the entire period of study. The current version of PPB Directive 1010.00 Use of Force indicates that resistance is classified as either "active" or "passive". The Monitoring Team combined active, aggressive, and deadly resistance for reporting purposes here because the classification of resistance was not consistent across the study period but could be reliably aggregated to show trends over time.



Officer Tenure

Another factor that could play a role in shaping use of force events is the tenure of the officers involved in them. The PPB open data portal provides tenure data for each officer completing a Force Data Collection Report (FDCR). That data shows that the percentage of officers with the least tenure (0 – 5 years) has increased from a quarterly average of 30.9 percent between Q3 2017 and Q2 2018, to 57.2 percent between Q2 2025 and Q1 2026 (an 85.1 percent increase). The percentage of officers with the next lowest tenure (6 – 10 years) declined from a quarterly average of 24.6 percent between Q3 2017 and Q2 2018, to 13.3 percent between Q4 2020 and Q3 2021 (a 45.9 percent decline), before climbing back up to 23.5 percent between Q2 2025 and Q1 2026 (a 76.7 percent increase). All other groups of officers with more tenure have exhibited either a low and stable or declining share of involvement in force events.

In recent years, PPB has experienced a substantial number of members departing and new members joining. While all members are trained and certified according to Oregon Department of Public Safety Standards and Training (DPSST) requirements, newer officers are more likely to be involved in force events. Whether this represents a lack of experience on the part of newer members at de-escalating confrontations in order to avoid force, an increased likelihood that newer members will encounter situations where force is required, or some other reasoning is unclear from the data available.



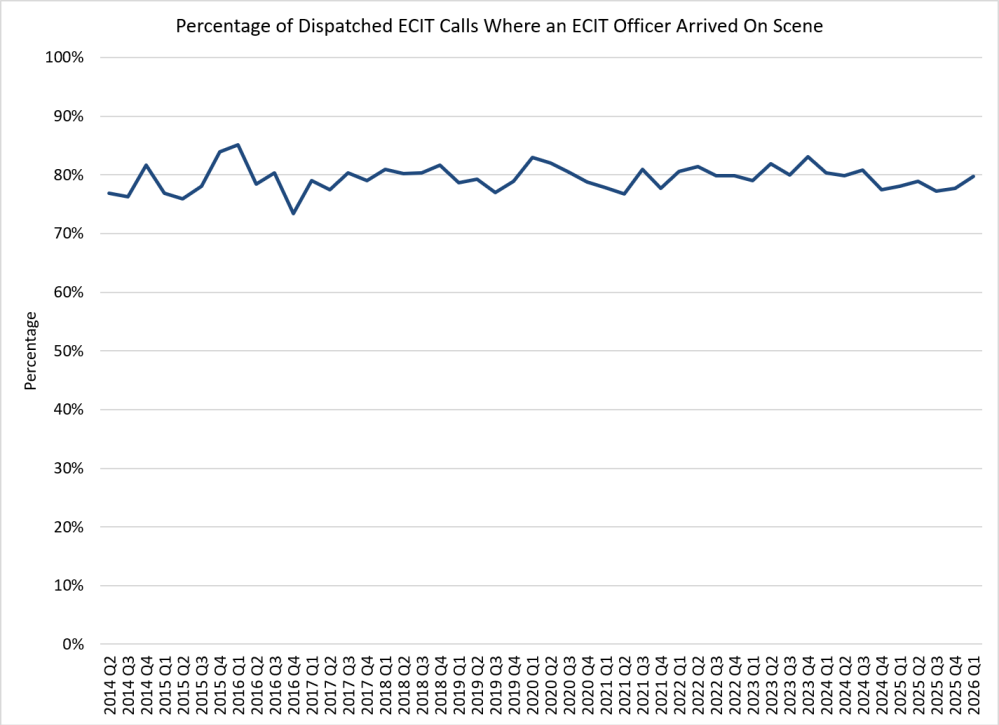
Metrics Associated with Responding to Persons in Mental Health Crisis

Paragraph 222 of the Settlement Agreement identifies several metrics related to interactions between PPB and individuals with mental health concerns.

Percentage of Enhanced Crisis Intervention Team (ECIT)-Dispatched Calls with ECIT Officers On-Scene

Dispatchers at the Bureau of Emergency Communications (BOEC) follow crisis triage system protocols to identify those eligible for dispatch to an Enhanced Crisis Intervention Team (ECIT) at PPB. The Monitoring Team obtained data from PPB's Computer Aided Dispatch (CAD) system about ECIT-eligible calls for service, including how many resulted in an ECIT-certified officer being dispatched.[73] The purpose of this metric is to assess how often PPB responds with ECIT-certified officers when eligible ECIT calls are dispatched to such officers.

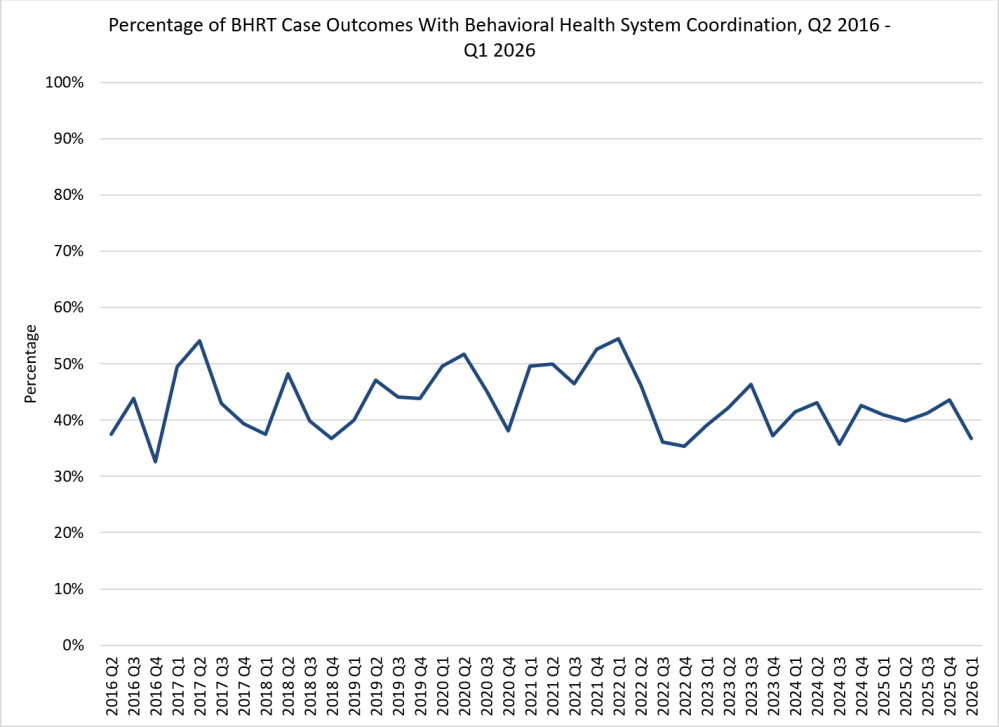
[73] PPB provided calls for service data on calls with an initial call type (assigned by BOEC dispatchers) of ECIT, as well as those with a final call type of ECIT. Final call types may be updated by PPB members in the field in response to information that may not have been available to BOEC dispatchers during the initial call. As such, calls that may not have been deemed ECIT-eligible during the initial call may be reclassified by responding officers if an ECIT officer is needed. For this analysis, the Monitoring Team used only calls with an initial call type of ECIT, and we excluded calls where the final call type was ECIT and the initial call type was something else.



Between Q2 2014 and Q4 2025, when an ECIT-certified officer was dispatched to a call for service with an initial call type of ECIT, they arrived on scene 79.4 percent of the time. Thus, roughly 4 out of every 5 ECIT calls had an ECIT officer on scene. The Monitoring Team acknowledges that PPB's ECIT resources are limited, such that if multiple ECIT calls for service are received at the same time, an ECIT officer may not always be available to respond. Additionally, the Monitoring Team notes that PPB still responds to ECIT calls when ECIT-certified members are busy with other calls, and that there are other tools in the crisis triage system that may be used to address such calls depending on the circumstances (e.g. Portland Street Response and the Multnomah County Crisis Line).

Behavioral Health Response Team (BHRT) Outcomes with System Coordination

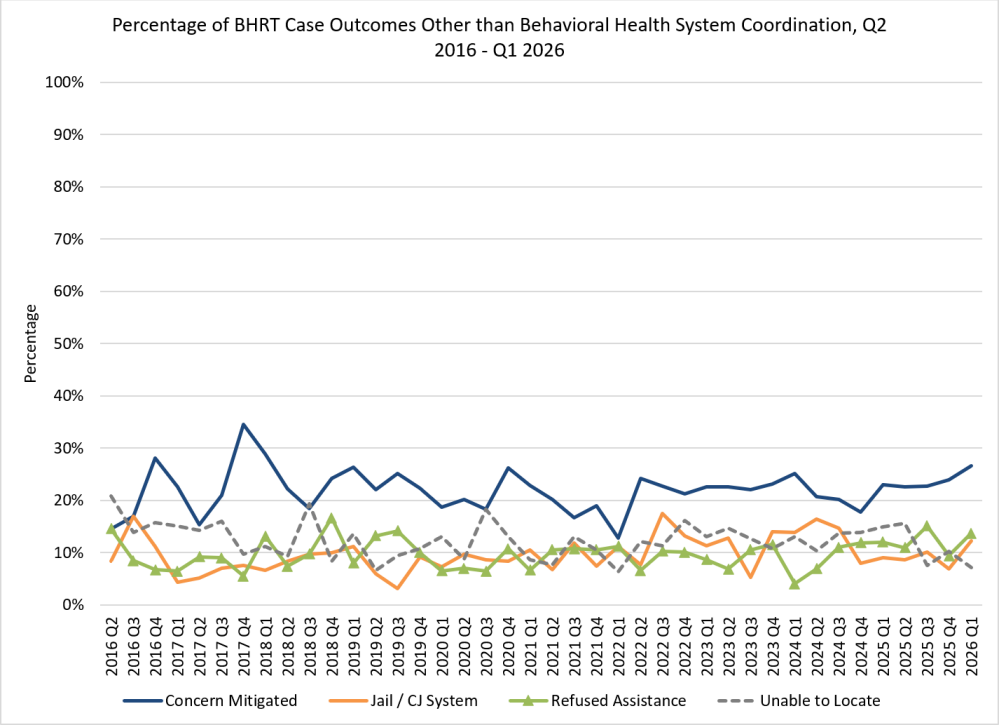
Behavioral Health Response Teams (BHRTs) pair a PPB officer with a mental health clinician who can connect individuals with appropriate mental health services when warranted. BHRT cases may reach a number of different outcomes, including: connecting an individual with mental health services; a civil commitment or acceptance of a diversion program because of a mental health civil hold; coordination between the behavioral health and criminal justice systems; mitigation involving direct contact with the individual or others associated with the individual; evaluation and referral to services through the criminal justice system (e.g. a criminal conviction in Mental Health Court, the Mental Health Unit of Probation and Parole, or other Forensic Diversion Programs); a refusal of services by an individual; an inability on the part of BHRT to locate an individual; or the discovery that an individual has moved out-of-state or is deceased.



The Monitoring Team obtained data from PPB's Behavioral Health Unit (BHU) regarding the disposition of cases between June 1, 2016, and March 31, 2026. There were 4,403 cases handled by BHRTs, of which 1,894 (43.0 percent) received some form of system coordination (i.e. coordinated services, systems coordination, or civil commitment). Statistical analysis of the trend indicates no significant increase or decrease across the provided time frame.

At 43 percent, behavioral health system coordination represents the most commonly occurring outcome associated with BHRT interaction. The next most common outcomes, in descending order, are that the concern is mitigated (22.3 percent), that BHRT is unable to locate the individual (11.9 percent), that the individual refused assistance (9.8 percent), or that the individual is entered into the criminal justice system (9.7 percent). As with behavioral health system coordination, statistical analysis of these trends indicates no significant increase or decrease across the provided time frame.

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PPB Encounters with Individuals with Actual or Perceived Mental Illness

The Monitoring Team obtained two data sets about individuals encountered by PPB and their actual or perceived mental illness. The Mental Health Indicator (MHI) is collected at the call level and asks, "Was the subject suffering from an actual or perceived mental illness?" The Mental Health Template (MHT) is required if a subject is suffering from an actual or perceived mental illness and a General Offense (GO) report is filed, or if an ECIT officer utilizes their ECIT-trained skills regardless of whether or not a GO report will be filed.[74]

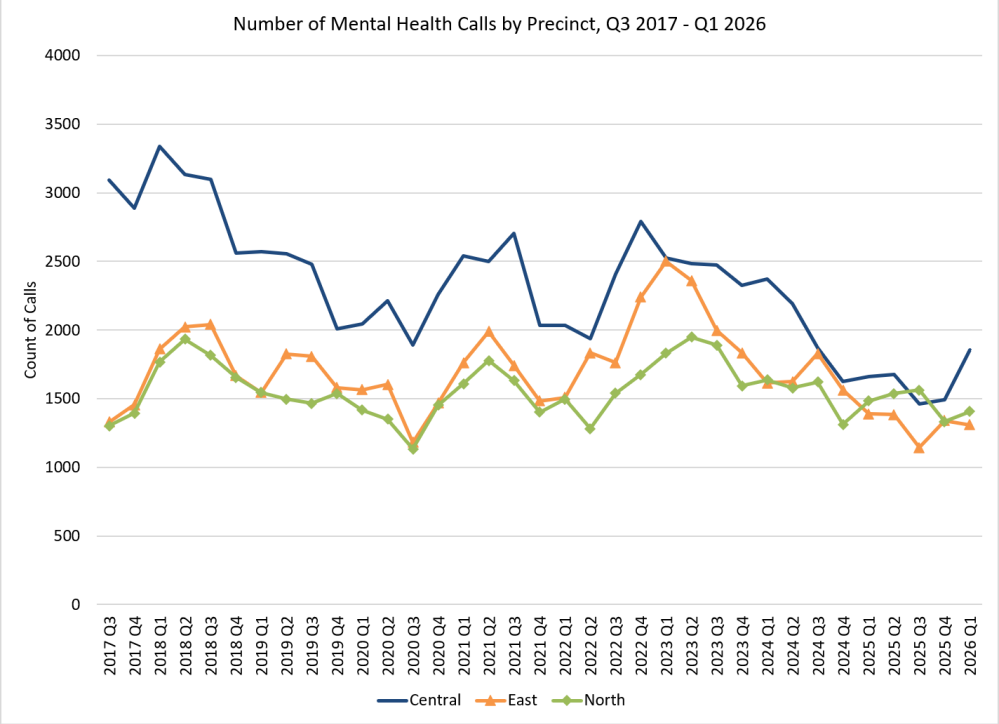
PPB provided data on 195,669 calls between Q3 2017 and Q1 2026 that were identified as mental health calls by the MHI. On average, PPB received 5,590.5 mental health calls each quarter during this time frame. The call volume shows an overall downward trend, with an average quarterly decline of 39 calls about which the MHI was answered affirmatively.[75] On an annual basis, the decline in

[74] PPB uses MHTs to identify subjects on only a subset of police interactions. While MHTs are often associated with a specific call for service, PPB notes that some MHTs are not. Similarly, it is possible that the subject of an MHT may also be the subject of a prior mental health-related call for service that did not generate an MHT. Therefore, completed MHTs represent an incomplete data source of PPB interactions with individuals experiencing actual or perceived mental illness; this should be taken into account when drawing any conclusions about this metric based on our reported measurements of it.

[75] The Monitoring Team fit both a seasonally-adjusted linear trend model and an Autoregressive Integrated Moving Average (ARIMA) model to the observed data. The linear trend model indicated non-trivial serial autocorrelation with a Durbin-Watson statistic of 0.490. The ARIMA model with AR1 autocorrelated errors and seasonally-adjusted linear trend fit the data better and accounted for the serial autocorrelation of the error.

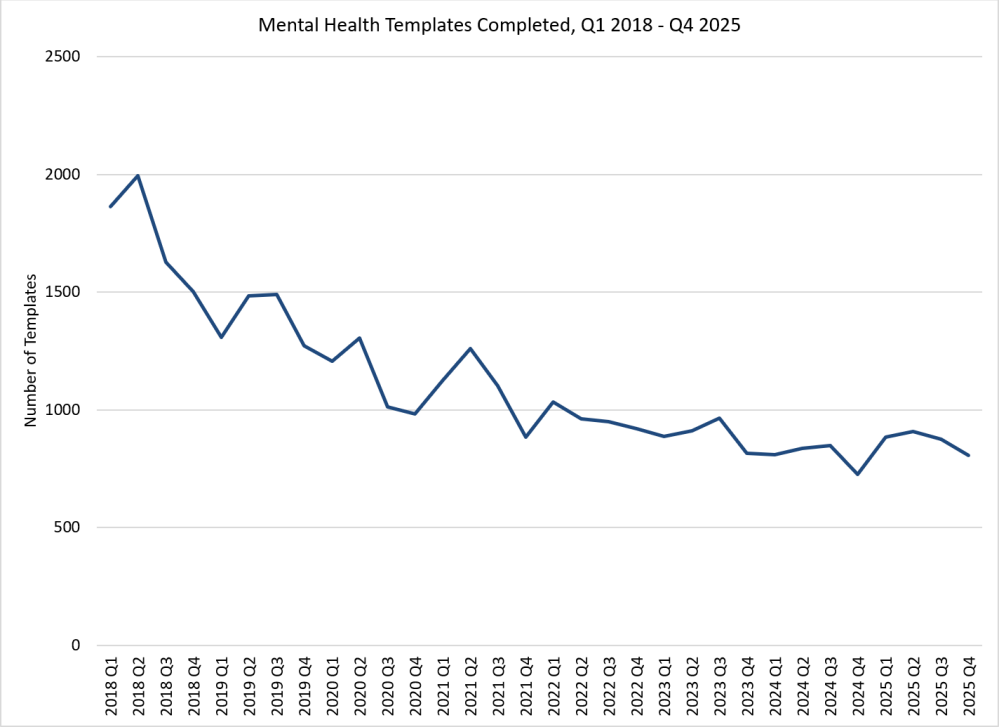
mental health calls was 155 per year. The decline, however, was not uniform, and the trend exhibited several substantial multi-quarter increases and decreases across the study period.

Decomposing the data across precincts, the trends identified Central Precinct as the driving force behind the Bureau-wide pattern. Of the 39-call per quarter decline identified Bureau-wide, Central precinct accounted for a decline of roughly 35 calls per quarter. East precinct accounted for a decline of approximately 3 calls per quarter, and North precinct was essentially flat over the study period.



PPB provided data on 35,559 MHTs completed between Q1 2018 and Q4 2025. On average, PPB completed 1,111 MHTs per quarter over this time frame. The trend shows a relatively stable downward trajectory, declining by approximately 31 templates per quarter, or 123 templates per year.

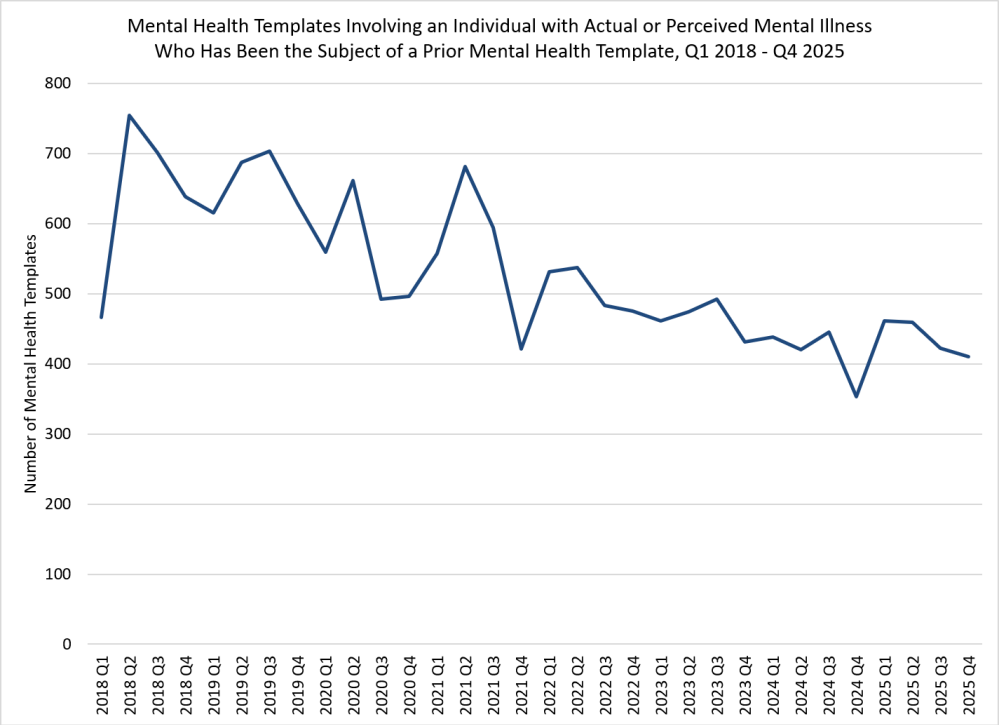
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Mental Health Templates (MHTs) Involving an Individual with Actual or Perceived Mental Illness Who Was the Subject of a Prior MHT

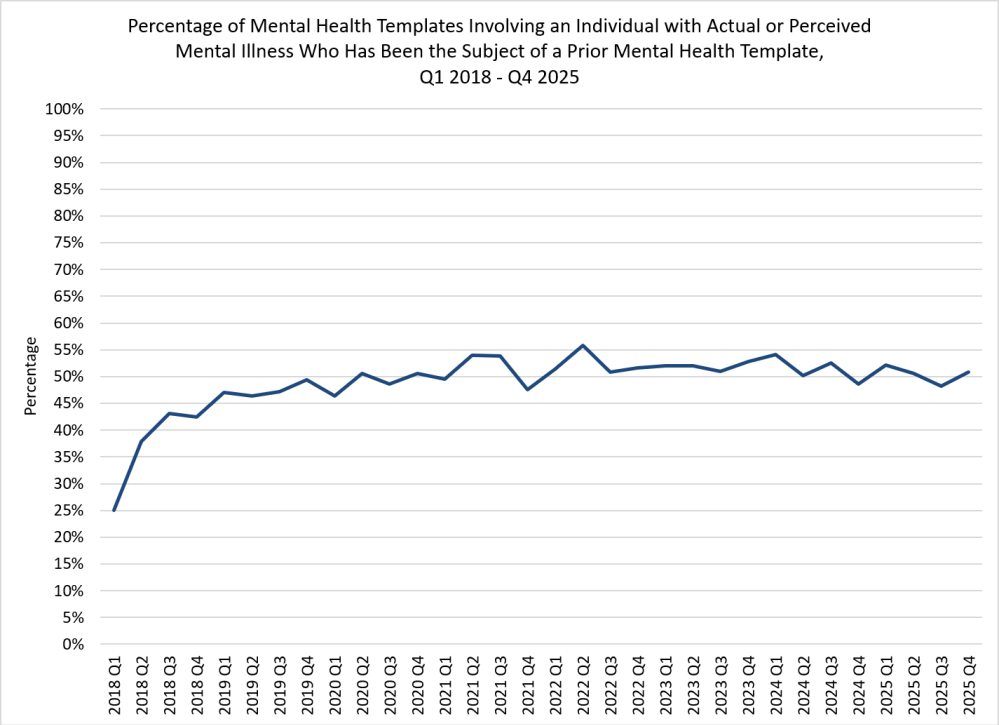
The MHT data provided by PPB allowed the Monitoring Team to calculate the number and percentage of MHTs involving individuals who had been the subject of a prior MHT. Across the entire study period, the quarterly average number of MHTs for individuals identified in a prior MHT was 529.5. Although the trend begins at 466 MHTs with a subject who had a prior MHT in Q1 2018, that number increased dramatically to 754 by Q2 2018. When adjusted to account for seasonal variability across quarters, the number of MHTs declined by approximately 8.8 templates per quarter, or 35 per year.

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The Monitoring Team also examined the percentage of MHTs where the subject had been identified in a prior MHT. Because the data began in Q1 2018, the percentage is lower at the beginning of the series and rises as the "data history" expands. After one year (Q1 2019), the percentage reaches 47.1 percent; and after two years (Q2 2020), it increases to 50.6%. After that, the percentage remains consistently around 51.3 percent.

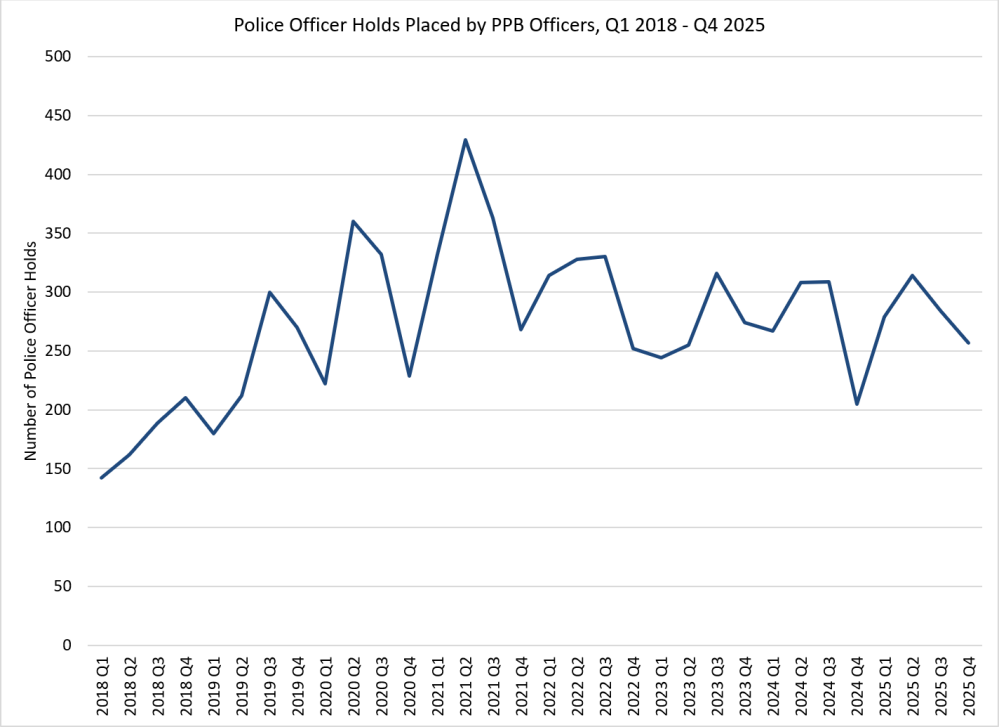
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Police Officer Holds (POHs) Placed by PPB Officers

PPB Directive 0850.21 Peace Officer Custody (Civil) allows members to take a person into custody if the member has probable cause to believe the person is dangerous to themself or any other person and needs immediate care, custody, or treatment for mental illness. Between Q1 2018 and Q4 2025, PPB members placed 8,736 POHs on subjects, averaging 273 such holds per quarter. Although the number of POHs in Q1 2018 was only 142, this number rose precipitously to a peak of 429 in Q2 2021. The number of POHs then declined markedly and remained between 205 and 330 from Q4 2021 through Q4 2025.

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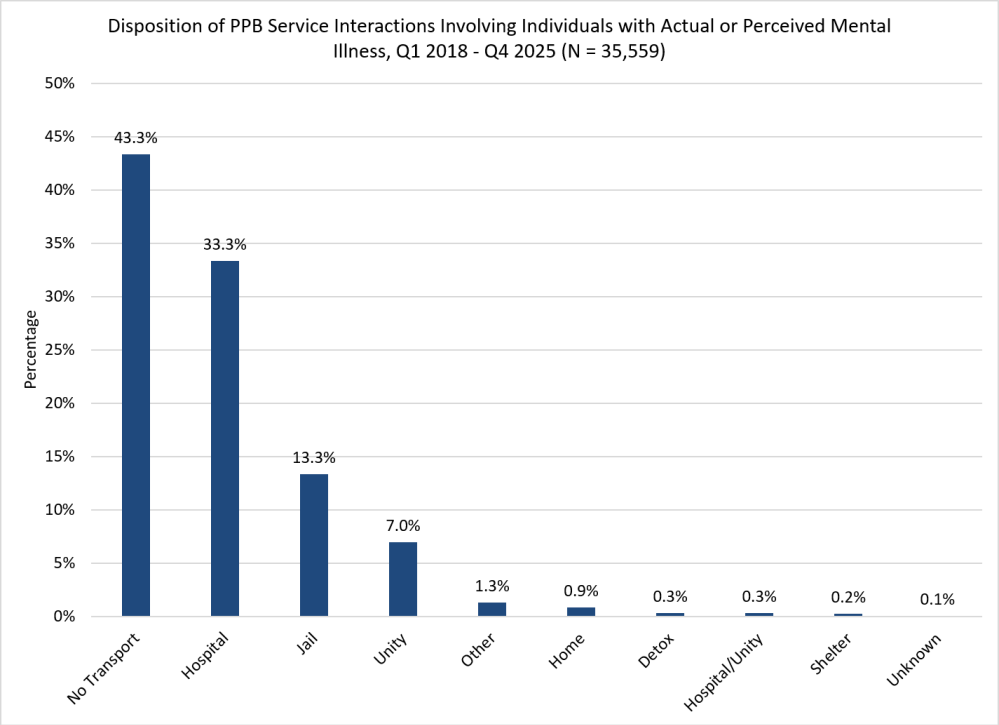


Disposition of PPB Service Interactions Involving Individuals with Actual or Perceived Mental Illness

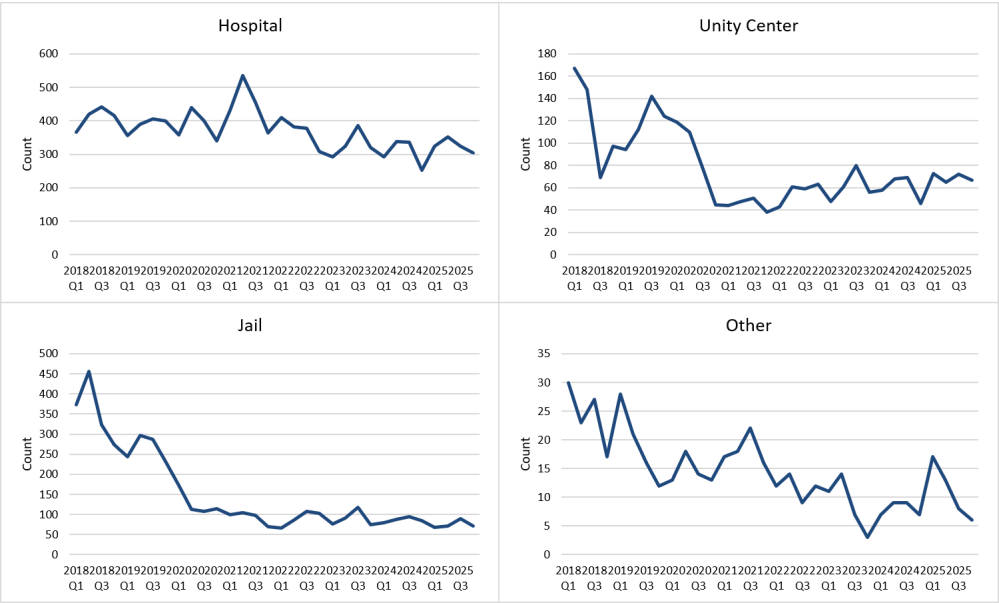
The Monitoring Team used PPB's data from the MHTs to assess the disposition of interactions with individuals with actual or perceived mental illness. The MHT data includes 10 possible dispositions.[76] Of the 35,559 MHTs included in the data, 15,404 (43.3 percent) did not involve the transport of the subject to a facility or other location as a result of the interaction. Of the remaining 20,155 MHTs, the most common disposition was referral to a hospital (11,848 or 33.3 percent of all MHTs), followed by jail (4,734 or 13.3 percent of all MHTs), and the Unity Center for Behavioral Health[77] (2,474 or 7.0 percent of all MHTs). The remaining six results occurred fewer than 500 times each (less than 1.5 percent of all MHTs).

[76] PPB's MHT data include a field titled, "Facility (if applicable)", which contains the disposition data required by Settlement Agreement Paragraph 222.b.vi. The data indicate where a subject with actual or perceived mental illness was transported following an interaction with PPB. Across the available MHTs, 43.3 percent did not include data for this field. PPB indicated to the Monitoring Team that the absence of data in that field signifies that transport to a facility or other location was not part of the disposition for the associated subject with whom PPB had interacted. The Monitoring Team presents these MHTs, in addition to those in any of the other nine disposition categories, in the chart immediately following this paragraph.

[77] The Unity Center for Behavioral Health is a 24-hour behavioral and mental health services center located in the greater Portland metropolitan area. It offers emergency as well as inpatient mental health treatment for adults, including walk-in or drop-off services.



Examination of the trends for each disposition indicated there have been declines across all of them. Only referrals to the Unity Center showed an increasing trend, albeit after a marked decline during the height of the COVID-19 pandemic between Q2 and Q4 2020.



Metrics Associated with Effective Training

Paragraph 222 of the Settlement Agreement lists four metrics with regard to PPB's training to inform outcome assessments. These metrics include:

- The number of officers trained, by the type of training provided;
- Training Division's response to the Force Inspector's referral of concerns of training deficiencies identified through use of force reviews or investigations;
- Officers' evaluations of the adequacy of training; and
- Training Division's assessment of incidents involving officer or subject injury.

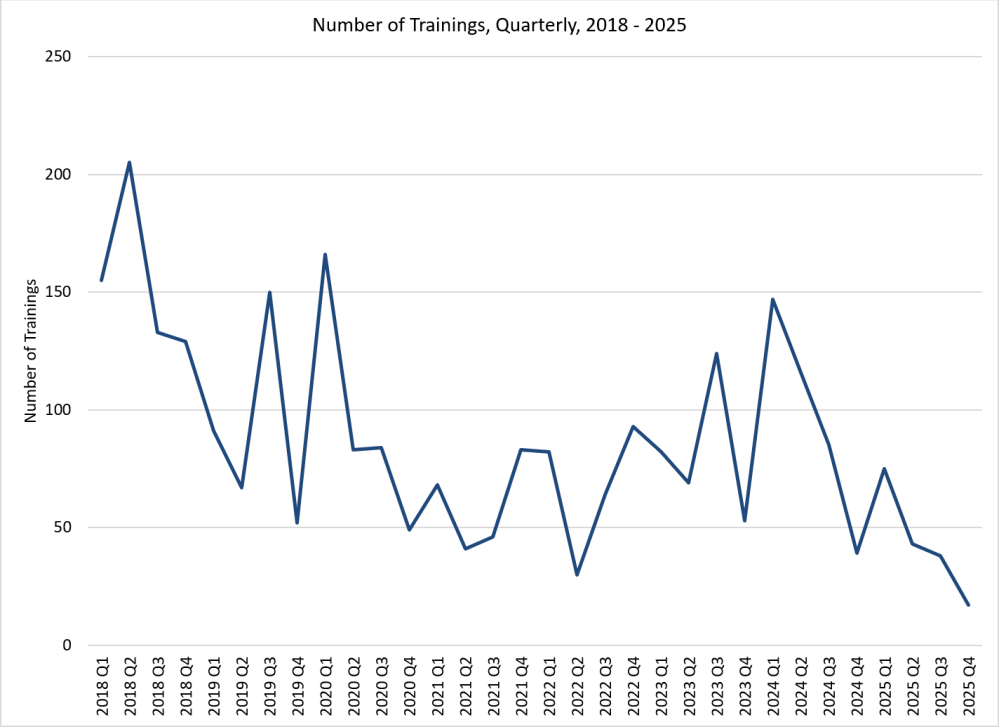
PPB has provided the Monitoring Team with data related to the number and types of trainings provided, Training Division's response to the Force Inspector's referrals of concerns of training deficiencies (through the Force Inspector Feedback Loop Document), and materials that Training Division uses when assessing incidents involving officer or subject injury.[78]

Number of Officers Trained, by Type of Training Provided

PPB provided data covering the period from Q1 2018 to Q4 2025 regarding training provided to its members, including the number of members completing each training. Some training courses required multiple sessions to complete, and PPB provided data related to each session provided. During the eight-year time frame of the study, Training Division reported delivering 2,759 training sessions, resulting in an average of 86 sessions per quarter. Those training sessions, however, are not uniformly distributed across quarters, and they exhibit heavy cyclical variations.

Training Division averaged 128 sessions per quarter through Q1 2020, with peak periods of training in Q2 2018, Q3 2019, and Q1 2020, and notable dips in Q2 and Q4 2019. During the COVID-19 pandemic and the public order events of 2020, into the first half of 2023, Training Division activity slowed, averaging only 67 sessions per quarter (a 22.1 percent decrease). Training session delivery appeared to increase in the latter half of 2023 through Q3 2024, averaging 105 sessions per quarter. Beginning in Q4 2024, however, training activity has slowed again, to an average of 42 sessions per quarter. Training Division delivered 17 sessions in Q4 2025, the lowest amount of activity across all eight years for which data was provided.

[78] PPB did not provide the Monitoring Team with data pertaining to officers' evaluations of the adequacy of training. As such, that metric is not addressed in our outcome assessments. In its communications with the Monitoring Team after the close of the Reporting Period, the City indicated that it anticipated being able to provide this data in the future despite its inability to do so for this Reporting Period.

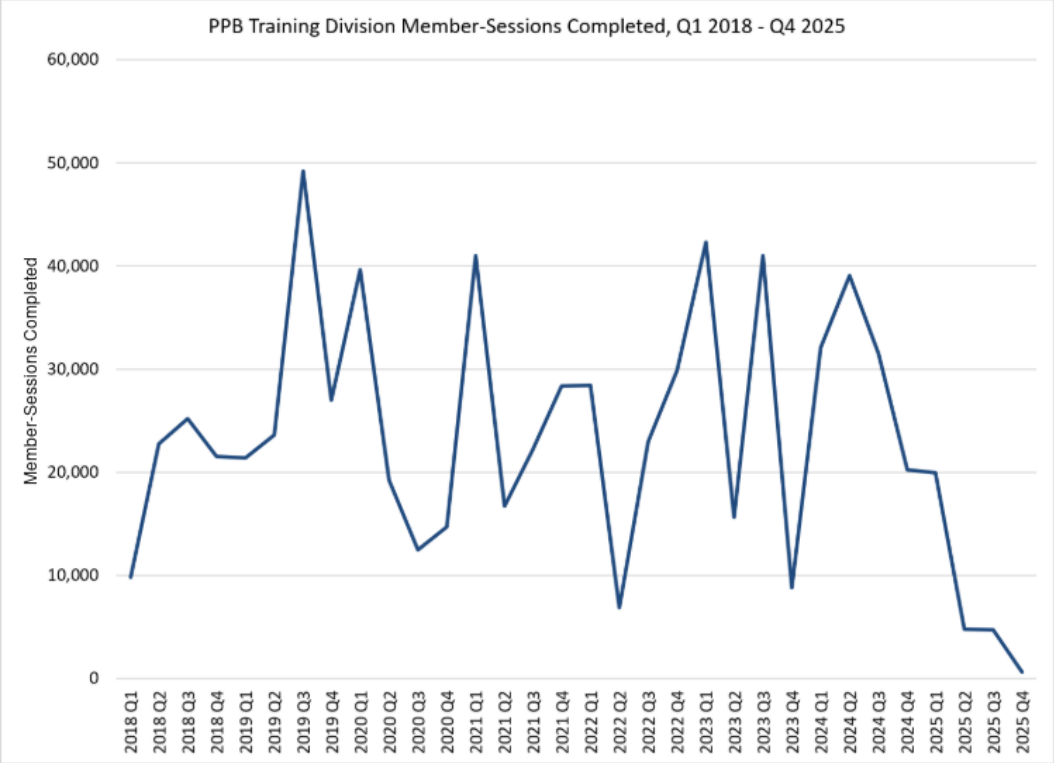


The types of trainings delivered by Training Division include a broad cross-section of courses that were grouped into 14 distinct categories.

Training / Category	Distinct Titles	First Year	Last Year	Years Observed
Use of force, firearms and defensive tactics	567	2018	2025	8
Patrol tactics and critical incident response	192	2018	2025	8
Public order and crowd management	82	2018	2025	8
Crisis intervention and negotiation	92	2017	2025	9
Investigations, evidence and case preparation	153	2018	2025	8
Traffic enforcement and police vehicle operations	167	2018	2025	8
Community relations, equity and procedural justice	92	2018	2025	8
Legal updates, policy and professional accountability	284	2017	2025	9
Supervision, leadership and personnel management	92	2018	2025	8
Officer wellness and occupational safety	155	2018	2025	8
Emergency medical care and rescue	40	2018	2025	7
Technology, information systems and communications	74	2018	2025	8
Specialized operations and support units	85	2018	2025	8
Instructor development and general training programs	158	2018	2025	8

PPB provided this data in a de-identified manner, and the Monitoring Team therefore did not assess the total number of members trained in any given quarter. Rather, we were able to assess the total number of training sessions completed by PPB members. Across the eight years of data received, PPB delivered 743,509 member-sessions in total, averaging 23,235.7 member-sessions per quarter.

The trend in member-sessions completed varied substantially from one quarter to the next through Q1 2025, ranging between 6,863 member-sessions in Q2 2022, and 49,171 in Q3 2019. During the last three quarters of 2025, however, member-sessions completed dropped precipitously to 4,759 in Q2, 4,659 in Q3, and 624 in Q4.



The training data provided by PPB also allowed the Monitoring Team to calculate the completion rate for members enrolled in training sessions. PPB reported a 94.8 percent completion rate, with the remaining 5.2 percent comprised of a combination of members who withdrew from training, failed to attend training, did not complete training, or were denied enrollment to training, or whose training remains in progress.

Training Division Response to Force Inspector Concerns of Training Deficiencies

The Force Inspector Feedback Loop is a document that tracks trends, training, tactical, supervisory, and policy issues related to the use of force. The document contains a summary of the issue(s) identified, commentary from the Force Inspector, and any responses from Training Division, policy staff, and command staff. PPB provided the Monitoring Team with Force Inspector Feedback Loop documentation dating back to Q3 2018, which we examined for Training Division's responses to issues that were identified.

While the Force Inspector's Feedback Loop document does not contain the final decisions regarding actual changes to training curricula, it does provide insight into the topics to which Training Division responds. Those topics included:

- Tactical decision-making;
- Ensuring proper training on Conducted Electrical Weapons (CEWs) when changes to that equipment occur;
- Training of rescue/recovery position post-force for patrol tactics;
- Proper AR-15 handling for safety;
- Clarifying the roles and responsibilities of PPB officers relative to other agencies that PPB may collaborate or partner with during the course of duties;
- BWC cameras inadvertently dislodging during physical altercations with subjects;
- Effectiveness and implementation of vehicle rams;
- Trailing subjects in vehicles;
- Verifying proper use of rifles in high-pressure scenarios;
- Supervisor investigative responsibilities for After Action Reports (AARs);
- Poor tactics to avoid;
- Proper ECIT response to subjects in crisis;
- Difference between single-vehicle static box-in maneuver versus vehicle ram;
- Proper technique when using a vehicle ram; and
- Pursuits in school zones.

Training Division's Assessment of Incidents Involving Officer or Subject Injury

The Monitoring Team requested documentation of Training Division's assessment(s) of incidents involving officer and/or subject injury, including the results of those assessments. The documents supplied by PPB included a wide range of analyses, which is summarized as follows:

- Annual Force Summary Reports from 2017 through 2024. These reports include tabulations of officer and subject injuries annually.
- Combined Injury Reports from 2020 through 2024. These documents contain tabulations of officer and subject injuries, causes of injury, and call types where injuries occurred.
- PPB Service and Occupational Claims dashboards from 2015 through 2023 and 2025. These reports include financial costs of disability and medical payments to injured officers, locations where injuries were sustained (e.g. on scene, precinct/station, training site, in vehicle, etc.), body parts injured, and detailed causes of injuries.
- PPB Pain Database from 2020 through 2025. These reports contain the dates injuries occurred, the types of injuries sustained (e.g. cut, contusion, fracture, loss of consciousness, etc.), and whether injured members received medical treatment.
- Training Division secondary analysis of case documentation for Officer-Involved Shootings, and use of force cases involving control tactics. These documents include both qualitative and quantitative analyses of certain cases to identify patterns that may warrant additional investigation and/or potential training to reduce injuries and protect members and subjects.

- Training Division Needs Assessment Summary and slide deck presentation to management. These documents demonstrate how Training Division uses its analysis of officer and subject injuries to contribute to its ongoing review and revision of PPB training.

The documents submitted by Training Division reflect the completion of routine reviews of data related to the occurrence of officer and subject injuries, the causes of those injuries, and the costs associated with PPB member injuries. Training Division also engages in more granular qualitative analysis of individual cases, such as OIS cases and use of force incidents where officers use control tactics such as takedowns, segmentation, or strikes and kicks.

The use of these data sources by Training Division provides a robust basis for the ongoing quantitative assessment of officer and subject injuries, for exploring the factors related to injuries associated with force events, and for potentially mitigating injuries through informed adjustments to training and tactics.

Metrics Associated with Community Engagement

In order to begin measuring the robustness of the City's systems of community engagement, the Monitoring Team endeavored to gather a variety of qualitative and quantitative information bearing relevance to those systems. Specifically in acknowledgement of the Settlement Agreement's direction to the Monitoring Team in Paragraph 223 to solicit input from community members and groups, our analysis was centered on a publicly available community survey. We received feedback from respondents regarding their overall awareness of the City's community engagement efforts, their participation in those efforts, their perceptions about the City's responsiveness to them and the influence of their input, their perceptions of changes in these things over time, and more. The Monitoring Team additionally gathered information through direct communications with both community members and PPB staff; and we also relied on our own direct observations of community engagement, largely through attendance at relevant public meetings between the City and the community.

Community Engagement Data Sources

The Monitoring Team circulated an anonymous, voluntary survey regarding experiences with the City's and PPB's community engagement efforts through multiple channels, including an email distribution list we have established over the course of our term and a QR code published within our website; we also gratefully relied on the assistance of multiple groups and individuals within the community as well as at the City and PPB to circulate the survey within their respective spheres of communication. The survey was available, and responses were collected, from August 14 through

September 7, 2026.[79] During that time, we received a total of 82 individual responses to the survey, all of which were included in our analysis and measurements.

The Monitoring Team's survey covered a total of 34 different elements.[80] For each element, we calculated the number and percentage of responses in each response category. The denominator we used was the number of non-blank responses to that item, including "Not sure" as well as some similar response categories, where present. The survey included some questions where multiple answer options were available for submission; these were reported as the number of respondents selecting each option, which means that some of the quantitative data we report may exceed the number of survey responses we received (82). In any instances where we combined related rating categories that were selected by respondents in their answers to a question, the combination is identified in our presentation of the associated data. Finally, we used narrative responses from individuals who submitted surveys to describe perspectives and examples without assigning them any specific numerical value.

The Monitoring Team's outcome measurement also drew on observations we made while attending meetings of the Portland Committee on Community-Engaged Policing (PCCEP), the Citizen Review Committee (CRC), the Focused Intervention Team Community Oversight Group (FITCOG), and the Community Board for Police Accountability (CBPA). Additional sources included our own semi-annual Town Hall meetings[81] as well as individual discussions with stakeholders such as the Coalition of Advisory Groups (CAG) and its individual member organizations, the Coalition of Communities of Color, and the Pacific Northwest Family Circle. We also communicated with PPB's Community Engagement Unit and were provided with an informative Community Engagement Summary by PPB.

Within this collection of data sources, it is prudent to recognize the Settlement Agreement's specific requirement for the creation of PCCEP as one critical piece of a system of community engagement. As indicated in the Agreement, PCCEP was created to leverage the ideas, talent, experience, and expertise of the community. Its membership was required by the Agreement to represent a broad spectrum of the community, and its authorities were required to include soliciting information from the community about PPB, receiving public comments and concerns, advising the Chief and others on strategies to improve PPB's community relations, and contributing to the development of a PPB Community Engagement Plan. PPB, for its part, was required to work with PCCEP as well as City resources to improve its engagement with the community. In all of these ways and more, PCCEP's

[79] It is important to note that the survey, which was the first of its kind initiated by the Monitoring Team for the purpose of measuring outcomes, was only available in English. We will endeavor to make any similar surveys we may utilize in the future widely accessible and available in other languages as well.

[80] Skip-logic was used for a handful of those, meaning that some respondents were presented with a few different questions than other respondents, based on the answers they submitted.

[81] These Town Hall meetings are held by the Monitoring Team pursuant to requirements in Paragraph 230 of the Settlement Agreement.

establishment and operation constitute directly relevant evidence in support of the robustness of the City's and PPB's broader system of community engagement.

Survey Responses

Information about Respondents

Survey respondents were asked to report their connections to Portland, with 67 of 82 respondents (81.7%) indicating that they live in the city, and 53 of 82 respondents (64.6%) indicating that they work in Portland. Asked whether they had taken part during the past 12 months in an activity where the City or PPB sought community input about policing, 46 respondents (56.1%) answered "Yes," 32 (39.0%) answered "No," and four (4.9%) were not sure. The respondent group included 60 of 80 respondents (75.0%) who were 45 years of age or older; 49 of 75 respondents (65.3%) who selected "White" as their racial identity; and 79 of 81 respondents (97.5%) who specified English or American English as their preferred language for important information.

34 of 79 respondents (43.0%) reported having served on a City or PPB advisory or oversight group. 28 of 79 respondents (35.4%) reported personal or family experience with a mental-health or behavioral-health crisis, and 15 of 78 respondents (19.2%) reported having a disability or long-term condition affecting daily activities such as those related to mobility, learning, or communication. 75 of the 79 respondents who answered a question about their housing (94.9%) indicated that they own or rent stable housing.

These characteristics describe the respondents who submitted answers to the indicated questions, but it is important to note that they are not intended by the Monitoring Team to be reported as representative of all Portland residents. According to the responses received, for instance, the survey may provide limited information about the perspectives of younger adults, people who prefer to receive communications in languages other than English, and people who do not have stable housing. Also, the dataset comprised of survey responses does not establish precisely how many people received an invitation to complete the survey or, therefore, a survey response rate. Responses to the survey provided the Monitoring Team with valuable insights from diverse individuals regarding community perceptions of, and experiences with, the City's efforts at engagement; on their own, however, the responses do not necessarily represent the views of all interested stakeholders throughout the Portland community at large, and they are not intended to be presented here as doing so.

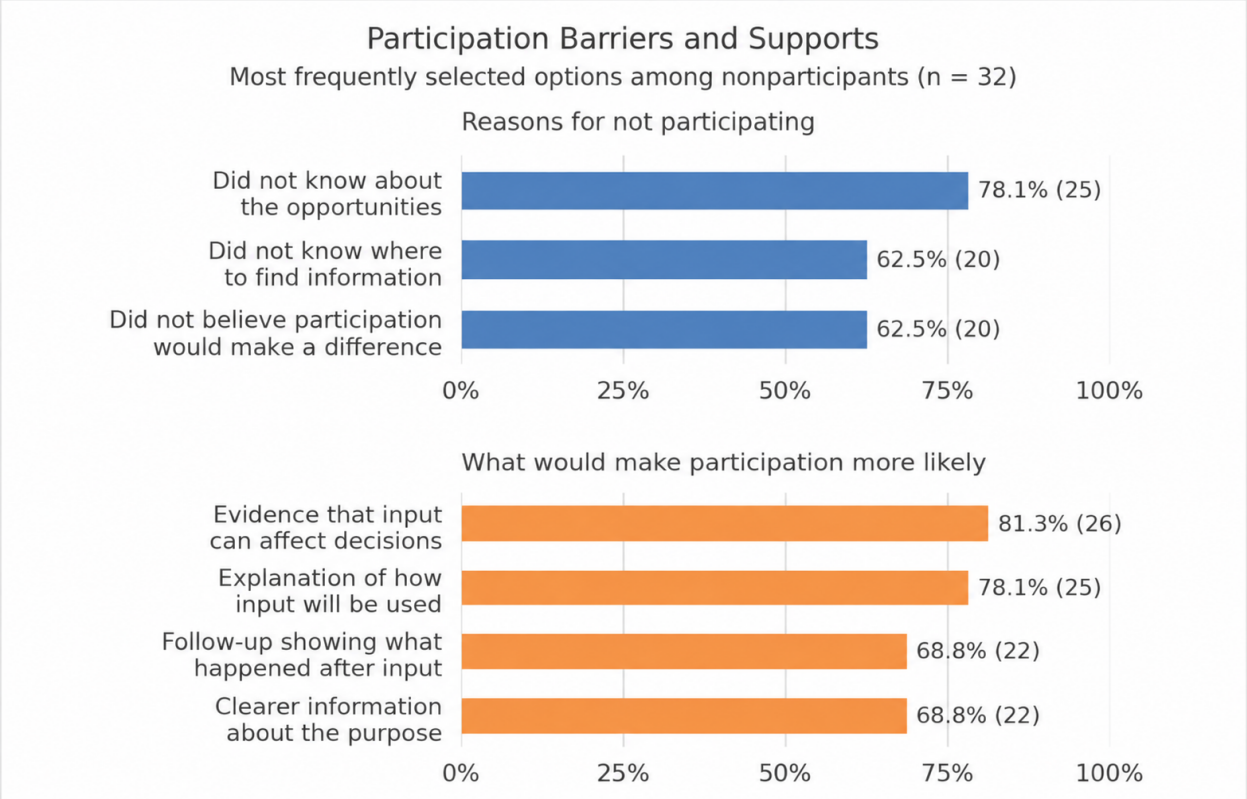
Awareness and Participation

Asked whether they knew where to find information about opportunities to provide input about policing in Portland during the past 12 months, 43 of 82 respondents (52.4%) answered "Yes," 34 (41.5%) answered "No," and five (6.1%) were not sure. Relatedly, 47 of 80 respondents (58.8%) selected either "Not too well" or "Not at all well" when rating the City and PPB on how well they let people know about opportunities to participate. In contrast, 33 of 80 respondents (41.3%)

selected either "Very well" or "Somewhat well" for the same rating. With respect to the City and PPB's effectiveness in reaching people who do not usually participate in government meetings, 45 of 79 respondents (57.0%) selected ratings of either "Not too well" or "Not at all well" while 16 of 79 (20.3%) selected either "Very well" or "Somewhat well".

Among the 32 respondents who reported not participating in community engagement activities with the City or PPB, 25 (78.1%) selected not knowing about opportunities as a reason, 20 (62.5%) selected not knowing where to find information, and 20 (62.5%) reported that they did not believe their participation would impact decision-making about policing in Portland. From the same group, 26 respondents (81.3%) indicated that they would be more likely to participate if they saw evidence demonstrating that community input can affect City or PPB decisions; 25 respondents (78.1%) indicated that a clear explanation of how their input would be used would encourage them to participate; 22 respondents (68.8%) reported that receiving follow-up information about what happened after community input was provided would encourage their participation; finally, 22 respondents (68.8%) indicated that clearer information about the purpose of a community engagement activity would also encourage their participation.

Together, these responses reflect the importance of effectively widespread notification of opportunities to engage with the City and PPB as well as communication regarding the potential impacts of such engagements.



*Both questions listed in this chart allowed for multiple selections; percentages listed may therefore not sum to 100.

Survey respondents also identified several of their preferred methods for participating in community engagement. A short online survey was selected by 65 of 81 respondents (80.2%); a meeting hosted by a community organization was chosen by 40 of 81 respondents (49.4%); 39 of 81 respondents (48.1%) selected a meeting focused on a specific community or issue; and 35 of 81 respondents (43.2%) preferred a neighborhood meeting.

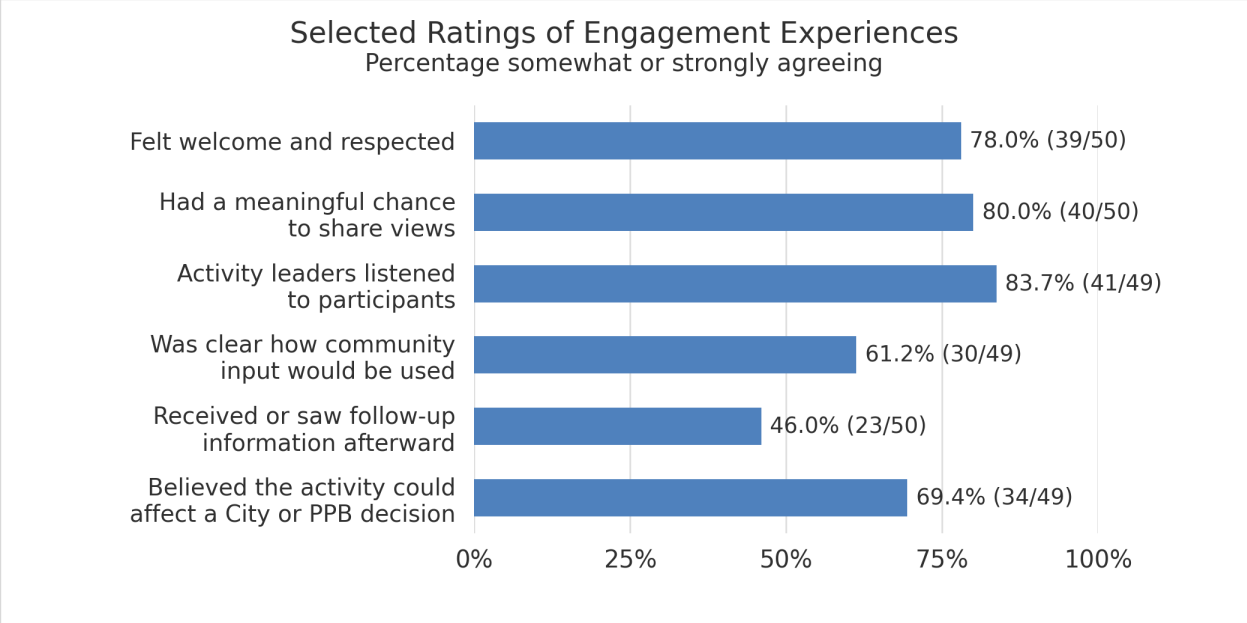
Experiences of Engagement

Survey respondents who indicated that they did participate during the last year in an activity where the City or PPB asked for community input about policing also described their participation experiences with respect to the opportunity to speak and be heard. Combining the responses of "Strongly agree" and "Somewhat agree," 40 of 50 respondents (80.0%) indicated that they had a meaningful chance to share their views, 39 of 50 respondents (78.0%) reported that they felt welcome and respected, and 41 of 49 respondents (83.7%) agreed that the people leading the activity listened to participants. Overall, 39 of 49 respondents (79.6%) rated the activity that they participated in as being somewhat or very useful, and 45 of 50 respondents (90.0%) indicated that they were somewhat or very likely to participate in another City or PPB community engagement activity.

Narrative answers submitted by respondents about their participation in community engagement activities included descriptions of recurring precinct meetings, relationships developed through advisory groups, opportunities for direct discussion, and consistent PPB attendance at PCCEP meetings as useful aspects of engagement. Some comments, on the other hand, described encounters in which respondents did not feel respected or believed their perspectives were disregarded. When asked which communities need more opportunities to provide input, respondents identified, among others, communities of color, youth, immigrants, people experiencing homelessness, people with disabilities, and neighborhood and business groups. Suggestions for improvement included clearer publicity, meetings in familiar community locations, regular non-enforcement contact with officers, and explanations of what happened after community input was received. Some comments expressed support for existing engagement efforts, while others connected distrust to concerns about police accountability.

Follow-up and Influence

Respondents' answers regarding follow-up efforts after community engagement events were less favorable, overall, than their answers about their experiences participating in those events. 30 of 49 respondents (61.2%) somewhat or strongly agreed that it was clear how community input would be used, and 34 of 49 respondents (69.4%) agreed that the activity could affect a City or PPB decision. However, less than half of respondents—23 of 50 (46.0%)—agreed that they received or saw follow-up information after they had participated in a community engagement event. The figure below presents these responses as well as selected ratings of opportunities to participate and be heard.



When asked about what specifically happened after participation in a community engagement activity, 22 of 48 respondents (45.8%) reported that the City or PPB explained what it planned to do, and 10 (20.8%) indicated that the City or PPB explained why it would not take a requested action. Seven respondents (14.6%) reported seeing a change in a policy, program, training, or practice, and five (10.4%) reported some other result stemming from community input.

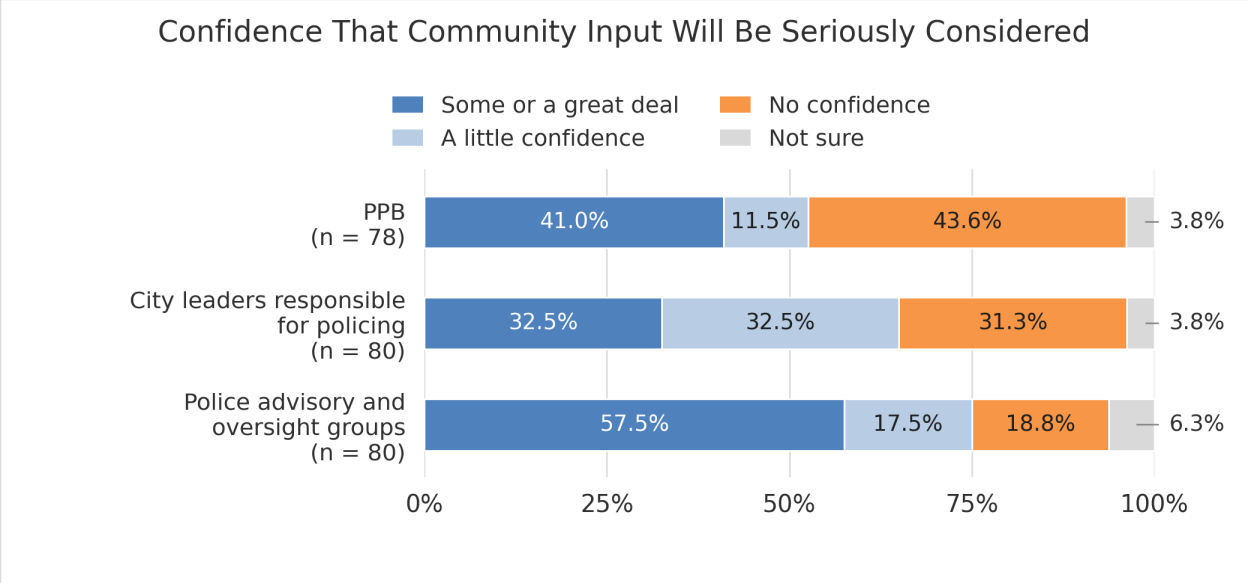
In addition to questions specifically based on respondents' participation in community engagement activities, the survey also asked more broadly about follow-up efforts by the City and PPB in response to input from community members. 43 of 80 respondents (53.8%) rated "the follow-up provided after community members give input" as somewhat or very weak, and 44 of 79 respondents (55.7%) assigned one of those same ratings to "the ability of community input to affect decisions." In response to statements listed in the survey about the City and PPB, 46 of 79 respondents (58.2%) disagreed or strongly disagreed that they involve the community in important decisions, and 44 of 79 respondents (55.7%) disagreed or strongly disagreed that input is requested before important decisions are made. When asked whether engagement efforts have an effect on decisions, 31 of 78 respondents (39.7%) agreed or strongly agreed, 36 (46.2%) disagreed or strongly disagreed, and 11 (14.1%) were not sure.

The survey responses also identified the type of information that respondents would like to receive after providing input on policing as part of a City or PPB community activity. Of the 78 respondents answering this question, 58 (74.4%) indicated that they would like to receive a list of decisions or actions taken, and 44 (56.4%) indicated that they would like to receive an explanation whenever a suggestion was not adopted.

Differences in Perceptions

In addition to questions about respondents' experiences participating in specific activities, the survey asked more generally about respondents' perceptions of the overall strength of the City's and PPB's community engagement efforts with respect to policing issues. Out of 80 respondents in total, PPB's efforts were rated somewhat or very strong by 32 of them (40.0%) and somewhat or very weak by 43 of them (53.8%). The City's community engagement efforts with respect to policing issues were rated somewhat or very strong by 29 of 80 respondents (36.3%) and somewhat or very weak by 45 respondents (56.3%). The remaining respondents who answered this question indicated that they were not sure about a rating.

Asked how much confidence they had that community input would be seriously considered by various entities, 46 of 80 respondents (57.5%) expressed some or a great deal of confidence that police advisory and oversight groups would give serious consideration to such input, compared with 32 of 78 (41.0%) with the same levels of confidence in PPB, and 26 of 80 (32.5%) with those levels of confidence in City leaders responsible for policing. Conversely, 34 of 78 respondents (43.6%) expressed no confidence that PPB would seriously consider community input, compared with 25 of 80 (31.3%) with that level of confidence in City leaders, and 15 of 80 (18.8%) with that level of confidence in advisory and oversight groups. The remaining answers to these questions from respondents were either "A little confidence" or "Not sure."

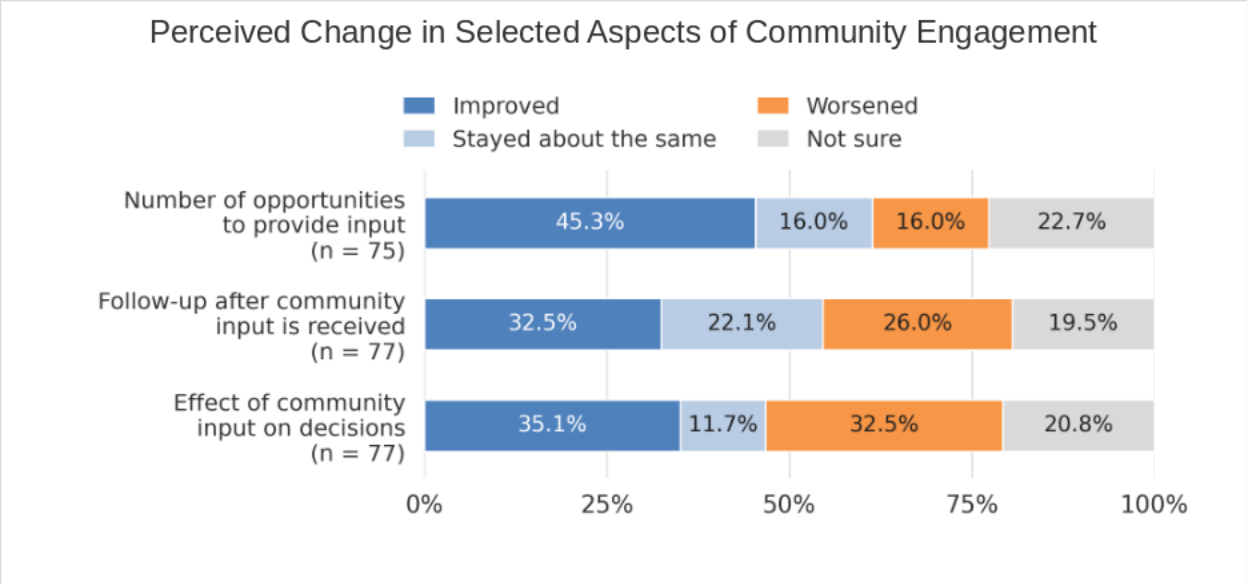


*Survey responses of "Some confidence" and "A great deal of confidence" have been combined in the above chart. Percentages listed include all non-blank responses and may not sum to 100 because of rounding.

Perceived Change Over Time

The survey asked respondents to compare their current impressions of the City's and PPB's community engagement with impressions they may have held in the past.[82] With respect to opportunities for them to provide input on policing matters, for instance, respondents more often reported improvement than regression. Of 75 respondents, 34 (45.3%) indicated that the availability of these opportunities had "Improved somewhat" or "Improved a lot"; 12 (16.0%) indicated the presence of such opportunities had declined; 12 (16.0%) reported that things had stayed about the same with respect to opportunities to provide input, and 17 (22.7%) were not sure.

Perceptions of change with respect to follow-up efforts by the City and PPB in response to community input, as well as the influence of community input on decisions related to policing, were divided. In connection with follow-up efforts after the receipt of community input, 25 of 77 respondents (32.5%) reported improvement over time, and 20 (26.0%) reported regression. As to the effect of community input on decisions, 27 of 77 respondents (35.1%) reported improvement over time, 25 (32.5%) reported regression, nine (11.7%) reported no change, and 16 (20.8%) were not sure.



*The "Improved" and "Worsened" categories in this chart each combine two corresponding survey responses. Percentages listed may not sum to 100 because of rounding.

PPB Community Engagement Records

PPB provided the Monitoring Team with a summary detailing its community engagement activities from January 1 through July 27, 2026 (the document was titled, "Portland Police Bureau Community Engagement-All RUs"). The summary reports 1,650 events held during that span of time, which

[82] The answers reflect respondents' qualitative perceptions of change with regard to those impressions, as opposed to comprising a quantitative comparison of measured activity counts over a specific and finite duration of time.

compares with 1,577 during the corresponding period in 2025—an increase of 73 events (4.6%). It also organizes completed engagement activities by reporting unit, geographic district, day of the week, and time of day, and it presents annual totals of events held extending back to 2018.

The Community Engagement Summary provides evidence that PPB is continuously tracking its engagement activity across reporting units and examining its quantity and distribution over time. The Monitoring Team notes that the summary report does not define what types of events are/are not subject to inclusion; nor does it record the numbers or demographics of community members who participate in events, or document any outcomes that may result from them. However, the summary bears direct relevance to an assessment of the robustness of community engagement because it provides a basis for reviewing where and when such engagement occurs and identifying any gaps that might warrant further attention and/or rectification. The reported increase in community engagement events in the first seven months of 2026 (as compared with the same period in 2025) is a reflection of PPB's efforts to ensure that its systems of such engagement remain robust.

Other Community Input and Monitoring Team Observations

Qualitatively, and not unlike the responses to our community survey, the Monitoring Team's attendance at meetings of entities associated with policing in Portland, the feedback we receive at our Town Halls, and the feedback we hear through discussions with individual stakeholders in the community are indicative of a spectrum of opinions about the robustness of the City's and PPB's community engagement efforts. For instance, we have observed energetic, proactive, and attentive engagement with PPB from members of PCCEP, CAG, and FITCOG (to name just a few) who volunteer their time and effort to help PPB identify improvements in its provision of policing services to the broader Portland community. Some of these engagements, based on our observations and interactions, have proved both rewarding and productive for the community members who are involved. Some others, on the other hand, have led to a feeling on the part of a community member that their voice is not being heard. Along those lines, we have also observed some community engagements with PPB that have resulted in frustration or exasperation on the part of the community members who are involved.

We have spoken directly with some stakeholders from the Portland community who consider PPB to be responsive to their individual needs—or, possibly, the needs of people close to them—and who are appreciative of PPB specifically for that reason. We have also heard a directly opposing point of view from individuals whose experiences with PPB have left them feeling unwelcome and/or victimized and who desire to remain completely disassociated from the agency. Acknowledging the distance between the very opposed perspectives we have heard about in our role as the Monitoring Team, and recognizing the vast area between them that makes up a middle ground of sorts, one simple but significant conclusion we have reached from our observations is: the City and PPB have a sizeable network of community entities available to them that effectively ensures PPB is informed by many different voices as it carries out its responsibilities; at the same time, there is more work yet to be done by the City and PPB in furtherance of ensuring that all

members of Portland's diverse community who wish to be a part of that informative network are included in it.

Conclusions

Using metrics identified by the Settlement Agreement in addition to others, the Monitoring Team assessed data related to intended outcomes identified within Paragraph 222 of the Agreement with the intent of learning to what degree they have been achieved. We look forward to continuing our efforts to further expand on these measurements in future reports as we obtain more data and increase our capacity to analyze it.

Capable systems and resources for responding to persons in mental health crisis
The number of PPB calls for service that include a mental health component decreased between Q1 2018 and Q4 2025 according to the two metrics the Monitoring Team assessed: the number of calls for service identified by the Mental Health Indicator (MHI), and the number of Mental Health Templates completed. Among calls for service identified by the MHI, those in Central Precinct exhibited a marked decline, while those in East and North Precincts remained relatively constant. Additionally, the observable decline in the number of MHTs PPB completes each quarter has begun to slow. Taken together, these data suggest that PPB's response to persons with mental health concerns is stabilizing around a new level of demand.

The City's systems for responding to persons with mental health concerns include Portland Street Response (PSR) and the Multnomah County Crisis Line (MCCL). Additionally, PPB utilizes its Enhanced Crisis Intervention Teams (ECITs) to address calls for service that are not appropriately served by either PSR or the MCCL. ECIT officers are on-scene in roughly 80 percent of cases when they are dispatched. PPB also relies on Behavioral Health Response Teams (BHRTs), which receive referrals of cases from patrol officers encountering individuals in need of assistance and coordinated services. Through its pairing of patrol officers with clinicians, BHRTs are often better suited to coordinate services across the healthcare and criminal justice systems than officers or clinicians would be on their own.

Effective training for police officers that increases the knowledge, skills and abilities necessary for effective and successful delivery of service to persons in mental health crisis
Between 2017 and 2025, PPB provided 92 training sessions related to crisis intervention and negotiation skills. The same number of training sessions was delivered on the (combined) topic of community relations, equity, and procedural justice. An additional 40 training sessions during this time frame covered emergency medical care and rescue. PPB's completion rate for these trainings was approximately 94%.

At the same time, since early 2018, the number of calls for service involving individuals with actual or perceived mental illness who have been subject to a prior call for service related to behavioral health has been declining. Additionally, those with a prior call for service related to behavioral health consistently represent only 50 percent of all calls with a mental health component. These two findings highlight an important pattern. The demand for PPB to respond to individuals in actual or perceived mental health crisis on a repeated and ongoing basis is declining alongside the demand for first-time responses. This change in demand could potentially reflect changes in: a) the size of the population of individuals with mental health concerns leading to calls for service from the community; b) the ability of individuals with mental health concerns to access services from providers, such that the need for calls for service to PPB is mitigated; or c) PPB members' ability to facilitate the coordination of services with behavioral health providers to mitigate future PPB calls for service. Whether any of these three factors are true, and, if so, which one(s) are playing a role in the observed patterns of calls for service related to subjects with actual or perceived mental illness, however, cannot be determined from the data provided to us.

Proper management of the use of force to meet constitutional standards

In our last report, the Monitoring Team found that the total number of PPB force events has been declining over time. The introduction of De Minimis force, and the concomitant reclassification of many types of force unlikely to result in injury to the De Minimis force category, produced a precipitous drop in force events in Q3 2024. Since that period, force events have increased slightly; however, it is unclear whether this is the start of a longer trend or a random fluctuation. The slight increase in force events is primarily driven by the continued steady increase in Category III uses of force, while more severe Category II force events occur less frequently and without any major trend over time.

Despite the small upswing in total force events, PPB members are applying force less frequently during those events. Both the number of applications of force and the number of applications per force event have continued to decline since the introduction of De Minimis force. When these patterns are considered together, it implies that when PPB members use force, they generally do so without numerous applications of it.

To further understand the continued increase in Category III uses of force, the Monitoring Team assessed the data it received from PPB through the lens of contextual variables that might impact force events; we examined whether and how those variables changed between 2017 and 2026. We found that the percentage of force events with armed subjects had been steadily increasing since 2017 until a precipitous decline began in Q1 2025. In contrast, we identified that the percentage of subjects of force perceived to be under the influence of drugs or alcohol declined somewhat in the latter half of 2022, but that there may be signs of the trend beginning to increase.

With respect to officer tenure, the Monitoring Team found the percentage of officers involved in non-deadly force events to be increasingly weighted toward those with less experience. In 2017,

officers with less than 6 years of tenure comprised about 30 percent of the officers involved in force events. In Q1 2026, that share rose to nearly 60 percent.

The Monitoring Team's measurements determined that the number of PPB force events has steadily declined over time. The decline in force events extends across different populations of subjects, including individuals with actual or perceived mental illness, as well as different contextual factors such as armed subjects, resistant subjects, and those under the perceived influence of drugs or alcohol. Although far more intensive studies would be required to determine whether the metrics we analyzed, individually or in combination, may have contributed to that decline (as well as to what degree), our measurements did not find any evidence that PPB's management of the use of force by its officers was improper with respect to applicable constitutional standards. We recognize that out-of-policy uses of force do still occur,[83] and we do not minimize the impacts that they (as well as any use of force, for that matter) may have on the parties involved. If PPB was improperly managing the use of force by its members, however, we would expect to potentially see data showing persistently high levels, outlier spikes, or upward trends in the use of force, rather than the opposite.

Robust systems of community engagement

The results of the Monitoring Team's community survey along with other sources of community input we considered for this measurement identify valued and effective opportunities for participation and direct discussion, paired with concerns about awareness, follow-up, and the influence of community input. Favorable accounts of selected activities exist alongside less favorable opinions of the broader engagement system. Both are relevant to an assessment of the robustness of the City's and PPB's systems of community engagement. Also relevant were the survey results indicating there were many more respondents who believed opportunities to provide input to the City and PPB on policing matters had improved over time than respondents who believed they had declined.

The distinction between providing engagement opportunities and demonstrating their results is a particularly important one. Many survey respondents reported a meaningful opportunity to speak and a willingness to participate again, but fewer reported receiving follow-up or observing desired changes. Among respondents who did not recently participate in any City or PPB community engagement activities, a lack of awareness and doubts that participation would make a difference were frequently cited reasons.[84]

[83] The review of PPB use of force incidents and investigations that we conduct in association with our assessment of the City's compliance with the Settlement Agreement confirms both that out-of-policy force occurs and that its occurrence is an aberration to the overall adherence to applicable force policies (as well as the Settlement Agreement) by PPB officers.

[84] The Monitoring Team acknowledges that some of these results identify matters that may be better understood through further examination in the future.

The Monitoring Team was unsurprised to see that community members value meaningful involvement and respectful consideration of their input by the City and PPB. Notably, the results of our survey also identified substantial concerns from respondents about follow-through after such input has been given and to what degree that input will influence associated decisions by the City or PPB. PPB's summary of community engagements encouragingly reflects an increasing number of events being held, which may help with the community's overall awareness of opportunities for them to establish a direct connection with PPB. However, a higher number of such engagements, while laudable, may not equate to an opportunity for previously unheard voices to become heard, especially if the engagements are not intentionally carried out with this objective in mind.

The presence of a network of entities in the City which, often through the hard work of deeply dedicated volunteers, creates multiple points of entry for community members to be heard and to voice their feedback about policing matters to PPB is favorable evidence pointing toward the robustness of the City's and PPB's overall community engagement efforts. Through receiving public comments during regular meetings, drafting recommendations for improvements to be made by PPB, joining together with PPB at social, cultural, and religious events to strengthen bonds between the police and the community they serve, etc., these entities play a critical role on a daily basis that helps maintain meaningful engagement between the City, PPB, and the community. Even so, however, the results of the Monitoring Team's survey in addition to some of our own observations (including of that same network of community entities) also indicate that many community members feel disengaged from the City and PPB, and that the pursuit of robustness with respect to the City's and PPB's overall community engagement efforts must therefore remain ongoing.

Work to Be Completed; Anticipated Barriers to Substantial Compliance

As initially noted in the Monitoring Team's previous semi-annual compliance report, an ambiguity associated with the replacement in the Settlement Agreement of accountability mechanisms in the City that were operational during this Reporting Period (i.e. IPR, the PRB, and the CRC) with one that was not yet operational (i.e. the Oversight System, comprised of the CBPA and the OCPA) remains worthy of clarification by the Parties. During the current Reporting Period, similarly to the previous one, this ambiguity led to PPB's production of self-monitoring reports that assessed compliance with provisions of the Settlement Agreement that were no longer in effect at any point during the Reporting Period (and that included references to and/or requirements for IPR, the PRB, and the CRC). Conversely these reports did not address the specific requirements for the Oversight System that are included in the versions of the Settlement Agreement that were in effect during the Reporting Period (even though PPB's self-monitoring plans, which accompanied their self-monitoring reports, did).

Relatedly, the Monitoring Team's finding in this report of Partial Compliance for Paragraph 195,[85] which calls for the operationalization of the Oversight System, reflects the reality that there is still much work to be completed before the OCPA is staffed, trained, and ready to meet its responsibility to conduct investigations; and much work also remains before the CBPA is ready to receive and adjudicate those investigations. Despite significant progress being made toward the fulfillment of those functions, it will still not be possible for the City to comply with the other paragraphs in the Settlement Agreement that are based on an operating Oversight System until much more progress has been achieved. On the other hand, simply assessing the City's compliance with the language of those paragraphs that is in the current Settlement Agreement (as opposed to the language that is in previous versions of it) would result in no assessments whatsoever of the City's compliance with the requirements involving IPR, the PRB, and the CRC, as none of them are included in the current Settlement Agreement despite their continued operation and role in ensuring accountability on the part of PPB.

Given all of this, the Monitoring Team again suggests that it would be prudent for the Parties to clarify—in the Settlement Agreement—what is expected of the City in terms of its compliance with those paragraphs that refer to the Oversight System and that establish responsibilities dependent on, or otherwise related to, the functioning operation of that system. Doing so would address the identified ambiguity and provide a clearer roadmap for the City to follow in the future in terms of ensuring that its self-monitoring plans appropriately match up with the evidence it relies on to demonstrate and assess its compliance with the affected paragraphs. Importantly, it would also provide added clarity to all interested stakeholders regarding the precise requirements that the City and PPB are expected to meet, both presently and in the future.

[85] This finding remains unchanged from our previous report.

In addition to the work that remains in order to operationalize the new Oversight System, the Monitoring Team believes that more work must be done by the City and PPB to improve members' rates of compliance with the requirements in PPB's BWC policies. During the current Reporting Period, as in the previous one, PPB's own audit—the findings of which we validated with a high level of agreement as part of our assessment of compliance with Paragraph 194 of the Settlement Agreement—accurately identified low rates of member compliance with multiple provisions of PPB Directive 0620.00 Body-Worn Camera Use and Management. These low compliance rates were a primary basis for our finding that the City and PPB were not yet in Substantial Compliance with Paragraph 194.[86]

Although BWCs are still relatively new for PPB as compared to numerous other law enforcement agencies of similar or greater size, they have been in regular use here since September 2024.[87] The Monitoring Team believes a present opportunity exists to minimize deviations from the numerous provisions governing the utilization of BWCs that are contained in PPB policy and, by extension, the Settlement Agreement. An increased organizational focus by PPB on those requirements—which could include, for instance, refresher training, targeted internal audits, efforts to identify and clarify any potential misunderstandings on the part of members, etc.—may prove beneficial in raising members' compliance rates. Until those rates improve, the City will remain unable to reach full Substantial Compliance with the Settlement Agreement.

Finally, the Monitoring Team continues to believe in the importance of a comprehensive and rigorous process of self-assessment on the part of the City regarding compliance with all Settlement Agreement paragraphs that are subject to self-monitoring. We have engaged in multiple productive communications with the City and PPB specifically focused on this issue, and we have seen significant improvements in the self-monitoring plans and reports produced by the City over the course of the Monitorship. These improvements in clarity and precision are the direct result of focused efforts on the part of various City and PPB staff members, and they are worthy of acknowledgement. The Monitoring Team looks forward to continuing to work with the City and PPB on making any further improvements that will help ensure their self-monitoring process meets the standards set out for it by the Settlement Agreement.

[86] This finding remains unchanged from our previous report.

[87] The City indicated that PPB's rollout of BWC equipment was completed during that month.

Appendix

Settlement Agreement Paragraph Summaries[88]

Paragraph #	Summary
66	PPB policy must include the principles that officers shall use only the force reasonably necessary under the totality of the circumstances and develop skills to resolve conflicts without force or with the least amount of appropriate force.
67	PPB policy must include the principles that officers shall use disengagement/de-escalation, account for information indicating a person is mentally ill, de-escalate force as resistance decreases, and receive discipline for objectively unreasonable force.
69	All use-of-force incidents must be timely and thoroughly reported, reviewed by supervisors, and meet criteria for specialized incidents including lethal force or in-custody deaths.
70	Supervisors must respond to use of force incidents, ensure proper investigation, coordinate medical care, notify relevant divisions, and complete After-Action Reports within 72 hours.
72	PPB must implement and annually review for revision a supervisor checklist capturing all required review elements for use of force incidents.
73	After-Action Reports must be reviewed through the chain of command, address training and policy issues, and require corrective actions and referrals as needed.
74	The Force Inspector must audit use-of-force reports and Reviews to ensure officers use and report force in compliance with PPB use of force and reporting policies.
75	The Force Inspector must audit use-of-force reports and Reviews to assess supervisors on policy compliance, completeness, timeliness, and systemic concerns, making corrections and notifications as appropriate.
76	The Force Inspector must perform quarterly analysis of force data to identify patterns of force application that deviate from PPB policy and correct any deficiencies discovered.
77	PPB must conduct quarterly audits of use-of-force reports and reviews to assess supervisors in the chain of command for policy compliance and identify trends or systemic issues.
78	PPB training shall instill expectations that officers are committed to the constitutional rights of persons with actual or perceived mental illness, and to build community partnerships to increase public trust and safety.

[88] The summaries in this chart were crafted by the Monitoring Team for reference and convenience; they are not authoritative representations of the Settlement Agreement's provisions, nor are they intended to be interpreted as such.

79	The Training Division shall conduct a needs assessment annually as part of the annual review and update to PPB's training plan.
81	The Training Division maintains a central file system, accessible to supervisors, to electronically track, maintain and report on training curricula and officer performance.
84	PPB must train officers and supervisors in crisis intervention, de-escalation, communication, procedural justice, and encounters with individuals in mental health crisis.
85	PPB, in coordination with COCL, must audit training programs using defined metrics including needs assessments, training plans, effectiveness, attendance, and policy accessibility.
86	PPB must conduct quarterly analysis of patterns and trends of use of force, identify proposed revisions to policy, training, and/or evaluation, and identify and remediate any training deficiencies.
88	The City's partners in the provision of community-based addiction and mental health services are expected to help remedy the lack of community-based addiction and mental health services to Medicaid clients and uninsured area residents.
89	Local CCOs are expected to establish one or more drop-off centers for first responders and walk-in centers for individuals with addiction or behavioral health needs. These centers should focus on appropriate discharge planning and community-based treatment.
90	CCOs must create mental health-focused subcommittees with City agency participation to pursue improvements, including data sharing, rapid access clinics, expanded diversion options, peer services, and tele-psychiatry.
94	PPB must establish an ABHU Advisory Committee with representation from City and community stakeholders to advise on behavioral health-related policies, practices, and oversight bodies.
95	The ABHU Advisory Committee must provide guidance and recommendations to improve CI Team, MCPT, SCT, BOEC Crisis Triage, and PPB contact with people in crisis, aiming to de-escalate potentially violent encounters.
96	The ABHU Advisory Committee must issue implementation status reports on ABHU and Crisis Triage and recommend improvements, and PPB must use these recommendations to inform changes.
115	The City must fully implement a Crisis Triage system within BOEC in accordance with policies determined under paragraph 113 of the settlement agreement.

116	PPB must require supervisors to document prompt reviews of employee performance in the Employee Information System (EIS) and analyze conduct data of units and supervisors to identify patterns of activity.
117	PPB must use force audit data to conduct analyses at supervisor- and team-levels.
118	PPB must perform case management review of officers using force in 20 percent of arrests in the last six months or using force three times more than the average force of officers on the same shift.
121	PPB and the City shall complete all administrative investigations of officer misconduct within 180 days of identifying the misconduct.
122	PPB and the Oversight System will conduct administrative investigations concurrently with criminal investigations of alleged officer misconduct, if any, concerning the same incident.
123	PPB or the Oversight System must provide the Monitoring Team and DOJ with a written review of any delays causing investigations to exceed the timelines in the settlement agreement and implement an action plan for reducing them.
124	PPB shall review and revise its protocols for compelled statements to Professional Standards Division or the Oversight System to comply with applicable law and professional standards pursuant to *Garrity v. New Jersey*.
125	The City will issue a communication restriction order (CRO) to all witness and involved officers following a lethal force event.
126	PPB will require witness officers to lethal force events to give an on-scene briefing to any supervisor and/or member of the Detective Division.
127	PPB will request involved officers in lethal force and in-custody death events to provide a voluntary on-scene walk-through and interview.
128	The City must implement a plan to reduce the redundant interview of witnesses by Independent Police Review (IPR) and Internal Affairs (IA) and enable independent investigation by IPR when necessary.
129	The City and PPB must ensure all allegations of excessive use of force receive full IA investigations, unless IPR finds clear and compelling evidence the allegation has no basis in fact.
131	The Police Review Board (PRB) must operate in line with charter, maintain procedural integrity, and address policy or training issues.
132	Investigating entities (i.e., IA and IPR) must make reasonable attempts to complete additional investigation requests from PRB within 10 business days.
133	PPB shall document findings of civil liability in the Employee Information System, reevaluate officer fitness for specialized units, and perform a full IA investigation.

137	PPB must define consistent disciplinary frameworks and apply them proportionately and equitably.
141	The City must establish the Portland Committee on Community Engaged-Policing (PCCEP) within 90 days of the relevant amendment's Effective Date.
142	PCCEP must be authorized to solicit information, make recommendations, advise leadership, contribute to PPB's Community Engagement Plan, and receive public comment in accordance with the PCCEP Plan.
143	PCCEP members must be broadly representative of the community and free from actual or perceived conflicts of interest with the City.
144	The City must provide administrative support necessary for PCCEP to perform its duties under the Agreement and the PCCEP Plan.
148	PPB must collect demographic information and must provide that information to PCCEP and to the public, and PPB must consider data collection enhancements.
150	PPB must issue a public annual report, provide a draft of it to PCCEP prior to finalizing it, and hold public meetings to provide education on community engagement efforts.
151	PCCEP must meet as needed and hold regular public Town Hall meetings, and the City must advise PCCEP to ensure compliance with applicable public meetings laws.
152	The City must provide PCCEP members with appropriate training necessary to comply with City and State law requirements.
188	The City must revise Force Data Collection Report and After-Action Report forms to capture when forms are edited and completed.
189	The City must fund an external entity to publicly report a critical assessment of the City's response to crowd control events in 2020.
190	The City must provide a separate line item for overtime costs necessary to train PPB officers.
191	The City must hire a qualified civilian to direct all educational aspects of PPB's Training Division.
192	PPB must assess command decisions during protest events to ensure accountability and policy compliance.
193	PPB must release its Annual Report and hold required precinct meetings no later than September 20 of each year.
194	PPB must implement and enforce a body-worn camera program department-wide, with clear usage and review protocols.
195	The City must establish an independent civilian oversight body with authority to review, investigate, and recommend accountability measures.

Random Sampling and Margins of Error

In conducting its assessments of compliance with the Settlement Agreement, the Monitoring Team recognizes that a complete and comprehensive review of all relevant incidents and documentation from the Reporting Period is not always feasible. To address this, the Monitoring Team used random sampling techniques in its assessments of some of the Agreement's paragraphs to select a subset of incidents to review. Random sampling and its associated statistical analysis techniques allow us to reliably estimate PPB's level of compliance with the Agreement using a smaller subset of cases instead of reviewing all cases. Such techniques are consistent with those used in national survey studies to generate estimates of public sentiment and are considered industry standard practice.

One limitation of random sampling methods is that results from sampled data may differ to some degree from true compliance rates arrived at when all data available in a population of relevant cases is reviewed. To acknowledge this potential in the context of our analysis, the Monitoring Team calculated the potential size of such a difference between the sample and the population. The Margin of Error (MOE) quantifies the potential size of the difference between the sample and the population and provides a range of values within which the true population value likely falls, with a known level of statistical confidence. We used a 95 percent confidence level in this report, representing a high degree of statistical reliability, and consistent with industry standards.

For example, the Monitoring Team may identify that PPB has achieved 94 percent compliance with one requirement of the Agreement. Based on the sample data and the size of the population of incidents the sample was drawn from, we might determine with 95 percent confidence that the MOE for this finding is +/- 5 percentage points. Therefore, we would report the finding as 94 percent (+/- 5.0%), which can be interpreted as indicating that PPB's true compliance rate for that requirement of the Agreement most likely lies between 89 and 99 percent.

To be clear, the MOE does not provide a range of values that are equally likely to be true. One benefit of random sampling is that the compliance estimate generated from the sample remains the best estimate of the true result. While the MOE provides a range of values within which the true population value might fall, values at the upper or lower bounds of the MOE are slightly less likely to be true than those closer to the sample percentage.

Margin of Error (MOE) Formula

Compliance estimates are presented in this report as percentages. Where random sampling was used, the Monitoring Team applied the following formula to calculate the margin of error[89] for each metric presented in this report:

$$MOE = \pm Z_{\alpha}\sqrt{\frac{p(1-p)}{n} * \frac{(N-n)}{N-1}}$$

Equation 1

Where:

- Z_{α} is the z-score from the standard normal distribution corresponding to a 95% confidence level, or $\alpha = .05$, in a two-tailed test. In this report, Z_{α} = 1.96.
- p is the compliance rate (i.e., percentage) calculated from the sampled data.
- N is the number of cases or incidents in the population from which the sample was drawn. For example, in this report the Monitoring Team sampled non-deadly use of force cases from a population of 207 Category 2 or 3 cases PPB members were involved in, as well as 147 cases where PPB members used only De Minimis force, for a total population of 354 cases (N).
- n is the number of cases or incidents sampled for the purpose of the analysis. For example, the Monitoring Team sampled 49 cases (n) involving non-deadly use of force from the population of 354 cases (N) PPB members were involved in, or approximately 13.8 percent of the population.

In some sections of our report, the Monitoring Team needed to use a subsample of our original sample. For example, when reviewing the results of the OIG audits, it was apparent that Electronic Control Weapons (ECWs) such as Tasers were not deployed in every force incident. Compliance assessments about whether PPB members followed PPB policy as well as the requirements of the Settlement Agreement with respect to ECW usage required examining a smaller subset of OIG audits in which ECWs were deployed. During this Reporting Period, our sample included six such cases. Where a subsample of cases, such as the ECW cases in the OIG audits, was used for compliance assessments, the Monitoring Team did not know the total number of audited cases in the population in which an ECW was deployed. Equation 1 for the MOE above could therefore not be calculated as specified because the value of *N* was unknown. Instead, the Monitoring Team used an MOE formula that does not include the finite population correction term, but retains all other terms as defined above in Equation 1:

[89] The MOE formula includes a finite population correction factor, $\frac{(N-n)}{N-1}$, because the population we draw the sample from is finite in nature, and because the sample is drawn without replacement.

$$MOE = \pm Z_{\alpha}\sqrt{\frac{p(1-p)}{n}}$$

Equation 2

In addition to the revision in Equation 2, the Monitoring Team encountered many instances where all sampled cases exhibited compliance with the Settlement Agreement. In these cases, the sample proportion (p) in both Equation 1 and 2 is 1.0, and the MOE is reduced to 0, meaning that when a compliance rate is 100% (or 0%), the MOE shrinks to zero. In these instances, the Monitoring Team did not report an estimated MOE with the results.

Finally, the Monitoring Team notes that the compliance assessments for many paragraphs of the Agreement did not require sampling data. For example, we reviewed all cases involving a use of lethal force or an in-custody death occurring during the Reporting Period. When sampling was not used, the compliance assessment findings represent the results from the population and are not subject to the same random sampling error that necessitates the MOE calculations above. Therefore, the Monitoring Team did not report MOE results in analyses using the entire population of cases.

Glossary of Acronyms

Acronym	Definition
AAR	After-Action Report
BHRT	Behavioral Health Response Teams
BHU	Behavioral Health Unit
BHUAC	Behavioral Health Unit Advisory Committee
BOEC	Bureau of Emergency Communications
BWC	Body-Worn Camera
CAD	Computer-Assisted Dispatch
CAG	Corrective Action Guide
CAR	Corrective Action Recommendation
CBPA	Community Board for Police Accountability
CEW	Conducted Electrical Weapon
COCL	Compliance Officer/Community Liaison
CRC	Citizen Review Committee
CRO	Communication Restriction Order
DOJ	United States Department of Justice
ECIT	Enhanced Crisis Intervention Team
ECW	Electronic Control Weapon
EIS	Employee Information System
FDCR	Force Data Collection Report
IA	Internal Affairs
IMLLC	Independent Monitor, LLC
IPR	Independent Police Review
LMS	Learning Management System
MCCL	Multnomah County Crisis Line
OIG	Office of the Inspector General
OIS	Officer-Involved Shooting
PAC	Police Accountability Commission
PCCEP	Portland Committee on Community-Engaged Policing
PPA	Portland Police Association
PPB	Portland Police Bureau
PRB	Police Review Board
PSD	Professional Standards Division
PSR	Portland Street Response
RU	Responsibility Unit
SOP	Standard Operating Procedure
TAC	Training Advisory Council