

Metropolitan King County Council Law & Justice Committee

STAFF REPORT

Agenda Item:	5	Name:	Greg Doss	
Proposed No.:	2017-0290	Date:	August 29, 2017	

SUBJECT

A motion that accepts receipt from the King County Sheriff's Office of a report on implementation of an enhanced, culturally appropriate Anti-Bias, Violence De-Escalation, and Crisis Intervention training (CIT) program.

SUMMARY

Proviso P4 in Section 21 of the 2017-18 Biennial Budget (Ordinance 18409) provisos \$800,000 of the appropriation made to the King County Sheriff's Office (KCSO) until the KCSO transmits by July 1, 2017 a report on implementation of an enhanced, culturally appropriate Anti-Bias, Violence De-Escalation, and Crisis Intervention training (CIT) program, a motion that acknowledges receipt of the report and the Council passes a motion related to the report. The required report was also to provide information on how many deputies have been trained to date and the additional funds needed to provide robust training to all deputies by December 31, 2018.

KCSO transmitted its proviso response on July 3, two days after the proviso's response requirement. KCSO's proviso response included two attachments and a transmittal memo which, together, are partially responsive to the proviso request. These provide information on the number of officers trained in CIT and Violence De-escalation, but not in Implicit Bias. Additionally, the response did not provide specific costs for deputies needing training in Implicit Bias or CIT. Finally, the motion accompanying the response accepts the response, whereas the proviso required a motion be transmitted that acknowledges receipt of the response. Staff subsequently requested the remaining information from KCSO. Together, the information provided in response to the proviso, in addition to the information provided to staff, indicates that all of KCSO's deputies have received some training in Procedural Justice (described below), Implicit-Bias and Violence De-Escalation. KCSO staff note that 227 of its deputies have not received any training in Crisis Intervention. Additionally, at the request of Council Staff for information,

the Department has submitted information on its plan to train on the above topics as well as cost information for training all deputies, or just Patrol deputies, by the end of 2018.

BACKGROUND

The Department's proviso response was transmitted on July 3, 2017 and addresses four types of police training: Implicit-bias training (anti-bias training), Procedural Justice training, Violence De-escalation training, and Crisis Intervention training. Following are descriptions of these trainings and explanations of how associated tactics are employed in police work:

Implicit Bias:

The U.S. Department of Justice (DOJ) has recognized social science research that shows that even the most well-intentioned people experience some degree of "implicit bias," the unconscious and often subtle associations we make between groups of people and stereotypes about those groups¹. This phenomenon is distinct from "explicit bias," the overt prejudice that most people associate with racism, sexism and other forms of bigotry.

The DOJ indicates that a large body of research shows that individuals can reduce their implicit biases or mitigate the effects of implicit bias in part simply by acknowledging it exists. In addition, scientists have shown that implicit biases can be reduced through positive contact with stereotyped groups and through counter-stereotyping, whereby individuals are exposed to information that is the opposite of the cultural stereotypes about the group. Moreover, social psychologists have found that with information and motivation, people can implement "controlled" (unbiased) behavioral responses that override automatic associations and biases².

In recent years, state and local law enforcement agencies across the country have integrated implicit bias education into their training programs, often with financial support from the Justice Department's Office of Community Oriented Policing Services (COPS Office). These trainings aim to serve several purposes: they help officers understand how unconscious and unintentional biases can affect their work; they reinforce the investigative skills that the department's law enforcement officers already possess; and they reaffirm the department's commitment to a criminal justice system that is fair, impartial and procedurally just. The DOJ has indicated that these trainings can make law enforcement personnel and prosecutors more effective, both by equipping them with additional skills and by strengthening the relationship between law enforcement and the community.

¹ All of the Implicit Bias narrative is credited to the DOJ Website: https://www.justice.gov/opa/file/871121/download

² All of the Implicit Bias narrative is credited to the DOJ Website: https://www.justice.gov/opa/file/871121/download

Justice Based Policing (Procedural Justice):

Procedural Justice within the policing context refers to the principles of fairness in the processes that resolve criminal justice disputes and allocate law enforcement resources.³ It is defined by the public perception of the fairness and the transparency of the processes by which law enforcement authorities make these decisions. Procedural Justice is the fulcrum upon which police legitimacy-the belief that the police have the right to possess and exercise their authority-balances.

The four pillars of Procedural Justice are: 1) giving citizens a voice and representation in the decision-making process, 2) offering transparent and trustworthy motives in the decision-making process, 3) maintaining neutrality (fairness and consistency) in the decision-making process, and 4) behaving with respect for a person's rights and dignity.

The purpose of Procedural Justice training is to create a broader awareness of Procedural Justice and its core principles, and to instill in officers the importance of utilizing Procedural Justice as a means of increasing police legitimacy. Officers learn how enhancing public belief in police legitimacy increases voluntary citizen compliance and community support, and, as a result, improves officer and citizen safety. These concepts are further discussed in a training guide developed by the KCSO Advanced Training Unit (ATU): Attachment 1B to Proposed Motion 2017-0290: Procedural Justice for Law Enforcement - Participant Guide - August 2013.

Violence De-Escalation:

In 2015, the Department of Justice highlighted the adoption of a Department-Wide Tactical De-escalation Training Program in Seattle⁴. The goal of the SPD training is to teach SPD officers that tactical de-escalation is more than a set of specific skills but also an overarching approach to incident resolution and community policing. According to the DOJ and SPD, de-escalation more broadly refers to the strategic slowing down of an incident in a manner that allows officers more time, distance, space and tactical flexibility during dynamic situations on the street. Applying these specific skills increases the potential for resolving the situation with minimized force or no force at all, which reduces the likelihood of injury to the public, increases officer safety and mitigates the immediacy of potential or ongoing threats. A reduction in use of force incidents also reduces community complaints, promotes the perception of Procedural Justice and, most importantly, promotes resolution of events with the public's compliance.

The SPD Violence De-Escalation training policy notes that when safe and feasible under the totality of circumstances, officers shall attempt to slow down or stabilize the situation so that more time, options and resources are available for incident resolution. The policy instructs officer to consider whether a subject's lack of compliance is a deliberate attempt

³ Procedural Justice for Law Enforcement – Participant Guide 2013. All references to Procedural Justice in this section are made from this source.

⁴ DOJ Website: https://www.justice.gov/opa/pr/justice-department-applauds-adoption-police-department-wide-tactical-de-escalation-training All references to De-escalation are made from this source.

to resist or an inability to comply based on factors including, but not limited to any of the follow factors or combination of factors:

- Medical Conditions, Mental Impairments, Developmental Disability, Physical Limitations, Language Barriers, Drug Interactions, Behavioral Crisis

The SPD policy indicates that an officer's awareness of these possibilities, when time and circumstances reasonably permit, shall then be balanced against the facts of the incident facing the officer when deciding which tactical options are the most appropriate to bring the situation to a safe resolution.

De-escalation techniques like the ones above were found to be a critical best practice by the President's Task Force on 21st Century Policing. The Report issued in May 2015 made a number of similar recommendations around the implementation of Violence Deescalation and alternatives to arrest when where appropriate⁵.

Crisis Intervention Training:

Crisis Intervention Training (CIT) equips police and other first responders with the training needed to enable them to respond most effectively to individuals in crisis and to help these individuals access the most appropriate and least restrictive services while preserving public safety. The training gives responders the tools to de-escalate situations, where previous law enforcement training might have called for escalation.

State Law⁶ requires the Washington State Criminal Justice Training Commission (WSCJTC) to provide eight hours of Crisis Intervention training to every new full-time law enforcement officer certified after July 1, 2017. This training is conducted when officers attend the State's basic training academy. Additionally, the WSCJTC must ensure that all law enforcement officers certified after July 1, 2017 complete a two-hour online Crisis Intervention course as part of the annual training required for any full-time, general authority Washington peace officer. Finally, the WSCJTC must provide all of the State's law enforcement officers with an eight-hour CIT training before July 1, 2021.

State Law also requires the WSCJTC to make efforts to provide a 40-hour enhanced crisis intervention training for at least twenty-five percent of all full-time, general authority Washington peace officers assigned to patrol duties.

The WSCJTC eight-hour and 40-hour CIT trainings allow public safety agencies to improve public safety responses to individuals experiencing a behavioral health crisis. In the WSCJTC model, police, fire, and medical personnel work together with behavioral health services to provide help to those people experiencing a behavioral health crisis.

⁵ https://cops.usdoj.gov/pdf/taskforce/TaskForce_FinalReport.pdf

⁶ RCW 43.101.427

The eight-hour class is designed to educate law enforcement officers on issues related to Crisis Intervention and provides materials, skills, and public relations in regards to dealing with mentally ill individuals while on duty. The 40-hour class is designed to educate law enforcement officers on issues related to becoming a Crisis Intervention Team (CIT) officer. The course covers the legal aspects of mental health commitments; liability issues; mental disorders; indicators of mental illness; understanding mental illness; documentation; the interpersonal relations necessary to effectively work with the mentally ill, their families, and the mental health system; and intervention strategies for dealing with both low and high risk situations⁷.

Office of Law Enforcement Oversight Letter on CIT Training and Policy Recommendations:

Transmitted with the Department's proviso response was a June 29, 2017 letter from the Office of Law Enforcement Oversight (OLEO) that discusses CIT training and makes three recommendations around the training of deputies at KCSO. This letter can be found in Attachment 1A to Proposed Motion 2017-0290: A. Crisis Intervention Team Training and Policy Recommendations from Deborah Jacobs Dated June 29, 2017 OLEO's three recommendations are as follows:

- 1. KCSO should require that all commissioned officers, prioritizing trainers in the Police Training Officer (PTO) program, complete the 40-hour Crisis Intervention Team Basic training and annual live, in-person CIT-specific training thereafter.
- Designate a CIT Coordinator who works through behavioral health crisis related incidents and questions with officers, is involved in reviewing KCSO CIT-related policies, helps develop CIT in-person training, acts as a liaison between behavioral health providers, OLEO and other community stakeholders, and maintains CIT data.
- 3. Review and revise relevant KCSO policies related to:
 - a. Community Caretaking Searches
 - b. Responding to Individuals in Behavioral Crisis
 - c. Violence De-escalation
 - d. Contacting People with Intellectual and Developmental Disabilities

⁷ WSCJTC website: https://fortress.wa.gov/cjtc/www/

ANALYSIS:

Proviso P4 in Section 21 of the 2017-18 Biennial Budget (Ordinance 18409) reads as follows:

Of this appropriation, \$800,000 shall not be expended or encumbered until the Sheriff's Office transmits a report on implementation of an enhanced, culturally appropriate Anti-bias, Violence de-escalation, and Crisis Intervention training program and a motion that should acknowledge receipt of the report and reference the subject matter, the proviso's ordinance, ordinance section and proviso number in both the title and body of the motion, and a motion related to the report is passed by the Council. The Council's intent is to ensure that the Sheriff's Office implements an Anti-bias, Violence De-escalation and Crisis Intervention training program and provides robust Anti-bias, Violence De-escalation and Crisis Intervention training to all deputies by December 31, 2018. The report shall provide information on the Anti-bias, Violence De-escalation, and Crisis Intervention training program, including, but not limited to, information on how many deputies have been trained to date and additional funds needed to provide robust training to all deputies by December 31, 2018. The Sheriff's Office shall transmit the report and motion required by this proviso by July I, 2017, in the form of a paper original and an electronic copy with the Clerk of the Council, who shall retain the original and provide an electronic copy to all Councilmembers, the Council Chief of staff and the lead staff for the Law and Justice Committee, or its successor.

KCSO's proviso response was transmitted on July 3, 2017, two days after the date required by the proviso. It was accompanied by a motion accepting the report whereas the proviso required a motion acknowledging receipt of the report; the motion also did not reference the proviso's ordinance, ordinance section and proviso number, as required by the proviso. Additionally, the proviso response includes two attachments and a transmittal memo which, together, are partially responsive to the proviso request. These documents provide information on the number of officers trained in CIT and Violence De-escalation, but not in Implicit Bias. Finally, the response did not provide specific costs for deputies needing training in Implicit Bias or CIT. Staff subsequently requested the remaining information. Information from the Department response, as well as information provided subsequently, is detailed below.

While the Proviso requested information on CIT, Anti-Bias and Violence De-escalation as a single "program," the Department has traditionally administered these types of trainings as: 1) a distinct class that focuses on a single issue; or 2), as part of the curriculum for a class on a related subject.

As an example of the first case, the Department has implemented annual online Implicit Bias training in each of the last four years. This is a 60-90 minute dedicated course that focuses specifically on the unconscious and subtle associations that all human beings make between groups of people and the stereotypes about those groups.

As an example of the second case, the Department has not required a specific class on Violence De-escalation, but rather has incorporated the fundamentals of Violence De-escalation into its TASER trainings. The Department indicates that its TASER trainings are more than just "point-and-shoot." The Taser trainings incorporate the principles of LEED (Listen and Explain with Equity and Dignity), which are a strategic use of verbal engagement skills and can help to de-escalate a potentially violent situation. Additionally, de-escalation is part of the Department's Procedural Justice Trainings, and the Department now requires its deputies to document de-escalation techniques when reviewing deputy use of force.

Table 1 below provides data that addresses each of the proviso training elements, the number of deputies that have been trained and the costs for training those deputies that have not been trained. It should be noted that these costs are approximations and mainly focused on the overtime necessary to backfill the Patrol duties of the deputies that attend the trainings. If the Department were to create its own trainings, it has indicated that it may need additional funds for instruction. As an example, the Department has indicated that it may need extra funding if it created its own CIT classes. More discussion of the WSCJTC program can be found below.

Table 1: To-Date Training of KCSO Officers⁸⁹:

Patrol Deputies Only (450 Total)			All Deputies (725 Total) *Includes Patrol		
Number Trained or To Be Trained by year-end 2018	Number Needing Training	Estimated Cost to Train Remainder	Number Trained or To Be Trained by year-end 2018	Number Needing Training	Estimated Cost to Train Remainder
No Data	No Data	No Data	498	227	\$144,318
273	177	\$561,494	394	331	\$1,100,713
450	0	Re-Training will occur as part of Three Day Patrol In-Service Training \$874,000	725	0	Extending Three- Day In-Service to all Deputies \$1.4 million
450	0	Re-Training will occur as part of Three Day Patrol In-Service Training \$874,000	725	0	Extending Three- Day In-Service to all Deputies §1.4 million
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2017 In-Service Training:

The KCSO Advanced Training Unit (ATU) has developed a three-day in-service training for all deputies and sergeants assigned to the Patrol Operations Division, which consists of approximately 450 officers. The Unit's command staff indicates that extensive research and planning was conducted in order to meet the requirements specified by the King County Council (via the proviso) and the Sheriff. The Department hopes to implement the three-day in-service training on an annual basis for personnel assigned to Patrol. Below

⁸ Table 1 assumes that 90 officers will receive WSCJTC 40-hour trainings by year-end 2018. These 90 officers are counted in the "Number Trained" column in Table 1.

⁹ Table 1 assumes that 75 Officers will complete the 8-hour CIT course as part of the Basic Law Enforcement Academy Training. These officers are counted in the "Number Trained" column in Table 1.

is a summary of the training schedule crated by the ATU. The training schedule can be found in Attachment 2.

Day 1: Tactical De-Escalation

All Deputies, under the evaluation of the Advanced Training Unit instructors, will:

- 1. Understand the role of de-escalation when responding to escalating incidents.
- 2. Demonstrate and understanding of the stages of escalating behavior, be able to identify the signs of suspect agitation and appreciate how police response to the event can impact resolution of the incident.
- 3. Identify fact patters, environmental conditions and scenarios that clearly establish situations that are exigent and require immediate police intervention.
- Identify tactically advantageous environmental conditions, such as expedient cover and concealment, and how they can be used to promote tactical deescalation.
- Understand and apply the "3-s" model to promote the assessment of scene control, begin subject engagement and how to derive a viable tactical solution with a minimal reliance on force.
- 6. Learn and employ engagement techniques including the use of the "O.P.E.N" model (Open ended questions, Paraphrasing, Empathy statements, Next steps).
- 7. Learn and apply body positioning skills to reduce agitation and promote subject compliance.
- 8. Demonstrate an understanding of individual and small team tactics to mitigate and incident, reducing the need to use force.
- 9. Employ trained individual and team skills in reality-based scenarios. Exercises will focus on identifying opportunities for appropriate application of de-escalation tactics and techniques to resolve the incident.

Day 2: Control and Arrest Procedures, Care after Force, Procedural Justice Refresher

Patrol Control and Arrest Procedures: The 4-hour course is designed to be interfaced with tactical de-escalation protocols and to be used as a base set of skills to be implemented against physical resistance prior to higher levels of force being considered.

Care after Force: The 2-hour course will show students how they can safely administer life-saving tools and techniques in order to help save lives. The training will focus on the tools that include tourniquets, AED's and other trauma related medical supplies.

Procedural Justice Refresher: The 2 hour course will be a refresher on the 8-hour Procedural Justice training that was administered to all commissioned personnel in

2013. It will provide a recap of the basic principles of Procedural Justice and the LEED Model (Listen and Explain with Equity and Dignity). The bulk of training will be victim focused with the goal of creating better victim engagement and more thorough investigations with victims of trauma and domestic violence. The training will include three videos of KCSO officers discussing the challenges and complexity of handling victims of domestic violence or victims of trauma. The ATU trainers will explain trauma informed interviews under the LEED model and Procedural Justice and introduce a template for those interviews to help officers build rapport and victim engagement. KCSO staff have indicated that there will also be an active anti-bias discussion on how KCSO biases (implicit/explicit) have a direct impact on the Department's interaction with the public it serves.

Day 3: More on Control and Arrest Procedures and Scenario Based Trainings

The trainings on this day will include a 4-hour segment on the Patrol control and arrest procedures described above as well as a 4-hour segment on scenario / reality based training. The latter training provide a learning environment for deputies to demonstrate their ability to effectively deal with dynamic, potentially dangerous situations that require a mix of communications, tactical, and decision-making skills.

2018 Refresher on Implicit Bias Training:

Department staff has indicated that the ATU plans to update the on-line Implicit Bias training that was used most recently in June of 2016. Staff also indicated that the updated training will be required for all commissioned personnel, and potentially all personnel within the Sheriff's Office. The training will be at least one hour. KCSO staff indicates that by the end of 2018, all commissioned Patrol personnel will have received at least one additional hour of Implicit Bias training to supplement the training they receive in the three-day in-service training noted above.

CIT Training Costs:

The King County Mental Illness and Drug Dependency sales tax will provide in the 2017-18 Biennium approximately \$1.7 million for all King County CIT related activities and classes, including the 8-hour in-service, the 40-hour course and all other CIT programs that are provided including, but not limited to, the Regional CIT Conference, CIT Youth, Mental Health First Aid for Public Safety, CIT for Corrections and CIT for Fire/EMS (8-hour in-services).

The WSCJTC receives an allotment of the MIDD funding to provide an 8-hour CIT training to all Academy recruits and to provide on a limited availability basis the 40-hour training for all King County law enforcement officers. King County MIDD staff have indicated that there is no specific budget for KCSO officers and that the WSCJTC is responsible for determining how much training each agency receives from the MIDD allocation.

KCSO staff have indicated that they plan to send a minimum of 5 officers per month to the WSCJTC's MIDD funded 40-hour training¹⁰. They have also indicated that this is the maximum number of slots that the WSCJTC currently allows for KCSO. Under this scenario, the Department could expect that another 90 officers would be trained by the end of 2018. Table 1 above assumes that 90 officers are trained by the WSCJTC by Dec 31, 2018.

As noted in Table 1, there are 394 Deputies who have or will have received the 40-hour CIT training by the end of 2018 and 331 who will not have received the training¹¹. Of the 450 <u>Patrol</u> deputies and sergeants in KCSO, 273 have or will have received the 40-hour training by the end of 2018. This leaves 177 <u>Patrol</u> deputies and sergeants that will have not been trained by the end of 2018.

The Department has indicated that it plans to place a higher priority on sending Patrol deputies and deputies that are involved in the post academy training of new hires. This policy is consistent with the recommendations made in the OLEO CIT and Policy Recommendations letter that was sent to the Sheriff on June 29, 2017.

The Department has indicated that it would need to supplement the WSCJTC 40-hour trainings to reach a goal of having all deputies trained by the end of 2018. It has indicated that this would present logistical challenges as well as funding challenges because the WSCJTC is not capable of training all KCSO deputies by the end of 2018 without the addition of more 40-hour course slots.

If the trainings could be made available to all untrained Deputies, by Dec 31, 2018, the Department would need approximately \$1.1 million for backfill overtime. If only Patrol was trained, then the Department would need an additional \$561k. These cost estimates are reflected in Table 1.

Other Training Costs:

The 2017-18 Biennial Budget¹² included an additional \$400,000 for trainings related to Implicit Bias, Violence De-escalation and CIT. The Department has indicated that \$143,000 of this funding was spent for the TASER recertification courses that also covered elements of Violence De-escalation. This leaves a remainder of \$257,000 available for further training in the Department.

KCSO budget staff have indicated that the remainder of \$257,000 will be credited towards the total cost of providing the Patrol-only, three-day in-service training discussed above. The three-day in-service training has been estimated to cost

¹⁰ Department Staff have indicated that the WSCJTC MIDD funding provides a backfill rate of \$58 per Deputy. Staff indicates that this is not enough to fund full backfill of KCSO Deputies and therefore forces the Department to absorb some costs for the 40-hour WSCJTC training.

¹¹ Training completed before year-end 2018

¹² Ordinance 18409

\$874,000. After crediting the remaining proviso-related training funds (\$257,000), KSCO indicates that there is an outstanding balance of \$617,000 in costs for the three-day in-service training. These costs are shown in Table 2. Below.

Table 2. Training Costs:

Trainings:	Costs		
Biennial Budget Add for Trainings	\$400,000		
TASER Trainings (Violence De-escalation)	(\$143,000)		
Three Day In-Service Trainings	(\$874,000)		
Unfunded Balance	(\$617,000)		

KCSO budget staff have indicated that the Department has submitted a request to the Executive for an additional \$400k to help with the \$617k difference noted above. KCSO staff indicates that the \$617k difference is based upon the assumption that 100% of the training will be done on backfill OT, but also notes that this might not be the case. After the implementation of the training, the KCSO Budget Office will seek additional appropriation if there is an ongoing need. Further, the Department indicates that it will track the costs for the purchase of less lethal shotguns and the subsequent training for deputies in their use. If necessary, the Department will include that cost in a possible future outstanding balance.

Conclusion

As is indicated above, the KCSO proviso response that Proposed Motion 2017-0290 would accept did not provide all the information requested by the proviso. The response did not include all of the numbers of deputies that were provided with the specified trainings and did not provide a specific cost for training the untrained deputies. This information was provided at the request of Council staff subsequent to the transmittal of the proviso response. Additionally, the proviso response: 1) was not transmitted until two days after the deadline of July 1, 2017; 2) was accompanied by a motion that accepts receipt of the proviso response instead of acknowledges receipt of the response, as required by the proviso; 3) the motion accompanying the proviso did not reference the proviso's ordinance, ordinance section and proviso number, also requested by the proviso; and 4) the proviso response was not attached to the motion.

Given the above, adoption of Proposed Motion 2017-0290 today may not suffice to release the \$800,000 in provisoed funds.

AMENDMENT 1

Motion 2017-0290 has two attachments: A. Crisis Intervention Team Training and Policy Recommendations from Deborah Jacobs Dated June 29, 2017; and B. Procedural Justice for Law Enforcement - Participant Guide - August 2013. The bulk of KCSO's proviso response that was transmitted on July 3, 2017 was included in the transmittal memo, which is not attached to the motion. Amendment 1 does the following:

- Attaches the KCSO's Transmittal Memo to Motion 2017-0290, making it Attachment C.
- Changes the receipt language from "accept" to "acknowledge receipt of, in order to make the motion language consistent with the proviso requirement.
- Adds language referencing the proviso's ordinance, ordinance section and proviso number.

Title Amendment 1.

The Title Amendment makes changes to the title in order to make it consistent with Amendment 1.

ATTACHMENTS

- 1. Motion 2017-0290 and its attachments:
 - A. Crisis Intervention Team Training and Policy Recommendations from Deborah Jacobs Dated June 29, 2017
 - B. Procedural Justice for Law Enforcement Participant Guide August 2013
- 2. Transmittal Memo containing a portion of KCSO's substantive proviso response
- 3. King County Sheriff's Office 2017 Proposed In-Service Schedule
- 4. King County GOM Policies

Use of Force

De-escalation

Community Caretaking Searches

Responding to People in Behavioral Crisis

Contacting People with Intellectual and Developmental Disabilities

- 5. Amendment 1
 - A. Attachment C, Transmittal Memo
- 6. Title Amendment 1

INVITED

- 1. John Urquhart, King County Sheriff
- 2. Patti Cole-Tindall, Chief, Technical Services Bureau
- 3. Deborah Jacobs, Director, Office of Law Enforcement Oversight