

King County
Office of Law Enforcement Oversight
Staff Assessment Project
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Executive Summary

The Office of Law Enforcement Oversight (OLEO) is dedicated to improving the lives of King County community members through its independent oversight of the Sheriff's Office. They aim to further policing standards that are driven by community and rooted in equity through objective reviews, independent investigations, and evidence-based policy recommendations.

OLEO represents the interests of the public by holding the King County Sheriff's Office (KCSO) accountable for providing fair and just police services, promoting transparency and integrity of Sheriff's Office operations, and ensuring the professionalism of the Sheriff's Office. OLEO's team conducts audits, reviews, investigations, and policy work, informed by community engagement and stakeholder partnerships.

OLEO looked to ProjectCorps to help assess its current staff, management structure, and program responsibilities to understand what additional staffing and structural changes are needed to allow OLEO to carry out the office's duties as outlined in the King County Charter and Code and as limited by applicable collective bargaining agreements. The research pointed to serious understaffing within the Department. This understaffing prevents OLEO from performing the following, and more:

- Following up on recommendations
- Conducting Audits and System Reviews
- Analyzing data and trends
- Reviewing all cases
- Investigating cases as allowed under the collective bargaining agreement
- Fully engaging the community
- Communicating OLEO's work to stakeholders

OLEO is forced to generally be in a reactive mode due to gross understaffing. They have little time to further programs, analyze outcomes, be proactive, or follow up on recommendations made to KCSO. Because of this they are unable to gauge the effectiveness of their requests for policy change, analyze effects of actual policy changes, draft independent findings for KCSO misconduct investigations, conduct independent investigations where appropriate, and more.

The following report illustrates the ways in which OLEO's assigned work is only partially completed, or not at all. It supports a request for additional employees and structural changes to adequately support the communities it serves and mandated work for which it is responsible.

1. Introduction

Project Introduction

OLEO is dedicated to improving the lives of King County residents through its independent oversight of KCSO. OLEO represents the interests of the public in its efforts to hold KCSO accountable for providing fair and just police services. By conducting independent reviews and engaging communities, OLEO seeks to make law enforcement accountability processes trustworthy, promote transparency and integrity of Sheriff's Office operations, and help ensure the professionalism of the Sheriff's Office.

OLEO engaged ProjectCorps to assist them with assessing department structure, current staffing levels and responsibilities.

Approach

Overall Project Approach

A business-oriented approach was used to gather information, analyze data, and arrive at OLEO staffing modification and changes. Three activities were identified at the onset: 1) Discovery, 2) Analysis, and 3) Documentation of findings in the final report.

Discovery

During Discovery, all OLEO personnel were interviewed individually to ascertain the following:

- Role responsibilities
- How the team is working together
- Responsibilities that are neglected due to current staffing levels
- Best and Worst thing about working in OLEO
- What support are they receiving from Council
- What they would change, if they could, in the department

We also reviewed department artifacts including the County Charter: Article 2, Section 265; the current OLEO Ordinance: King County Code 2.75 Law Enforcement Oversight; Previous Staffing Assessment completed in 2018; current Collective Bargaining Agreement (CBA) between the King County Sheriff's Office and the King County Police Officers Guild; Organizational Charts; and Job Descriptions.

We met with similar organizations in size and scope for comparative purposes and learned that OLEO is expected to do much more work than other organizations that have more staff and fewer responsibilities.

Analysis

During the Analysis phase of the project, we reviewed the interview results looking for themes and opportunities.

Deliverable

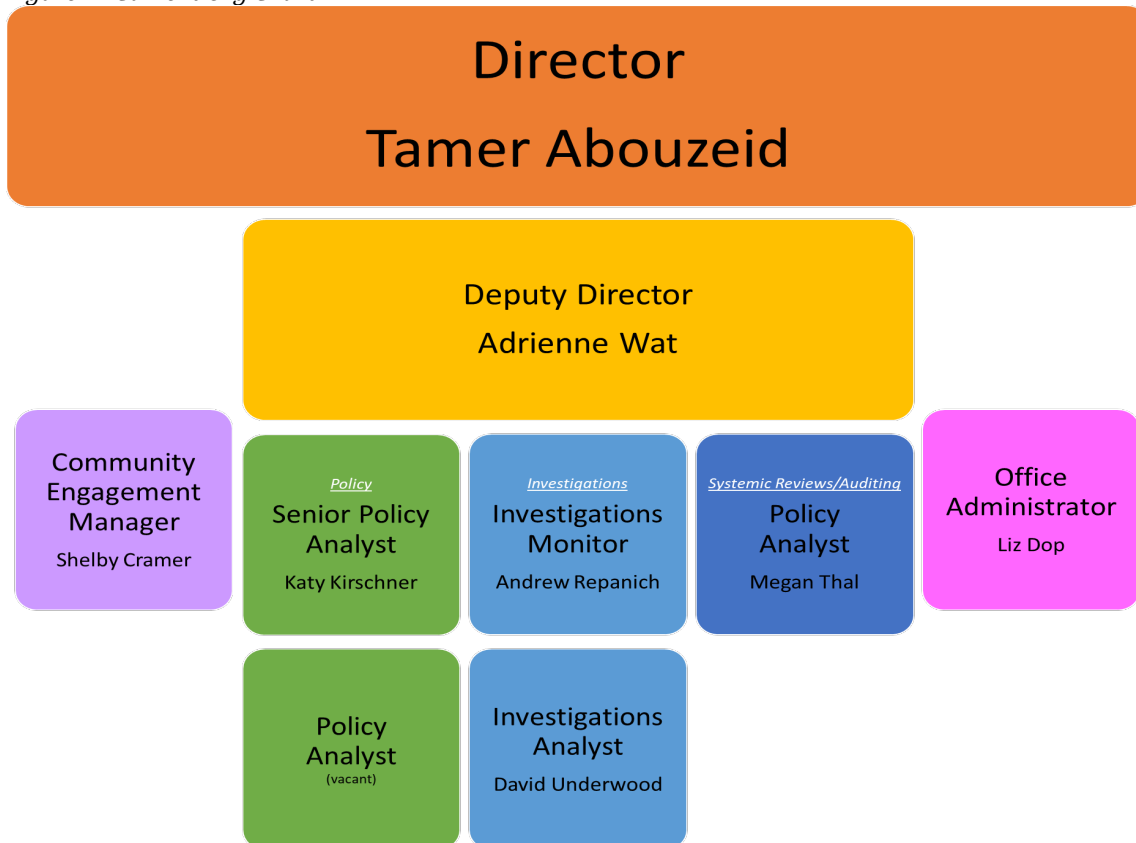
Lastly, all findings were documented resulting in this report.

2. OLEO Overview

OLEO is led by Tamer Abouzeid, serving in the Director role. Tamer is an attorney and joined the organization in September 2021. He provides overall management, strategic direction, and functional leadership for OLEO and its staff as its Director. He is the steward of the public’s interest to improve policies and practices both within OLEO and the Sheriff’s Office. Tamer also manages communications and external relations, enables community engagement, and directs the development of policies, practices, and recommendations that continuously improve the Sheriff’s Office operations and advance OLEO’s purpose. In addition, the Director works to expand OLEO’s capacity for oversight by improving codes, advocating for OLEO’s authority during collective bargaining, and establishing cooperative relationships with the Sheriff’s Office. His team includes the following:

OLEO Team

Figure 1. Current Org Chart



Adrienne Wat – Deputy Director

Adrienne is an attorney, and her experience includes work as a public defender, as a judicial clerk at the Washington State Supreme Court, and as a Fellow at the Korematsu Center for Law and Equality. Adrienne, as the Deputy Director, provides functional

leadership for OLEO staff and provides expert analysis of law enforcement policies and practices to enable OLEO to fulfill its duties and address compliance issues with OLEO's authority. Additionally, the Deputy Director provides strategic recommendations for issues affecting OLEO during collective bargaining, manages OLEO access to Sheriff's Office information, and oversees specific program areas of OLEO.

Andrew Repanich – Investigations Monitor

Andrew is an attorney and spent 17 years in public defense prior to joining OLEO. He is the Investigations Monitor, providing programmatic and investigative leadership within OLEO's monitoring of the Sheriff's Office Internal Investigation Unit (IIU). The Investigations Monitor provides expertise and recommendations that improve the quality of investigations related to allegations of misconduct by Sheriff's Office personnel as it relates to how complaints are classified, helping ensure investigations are thorough, objective, and timely, and providing the Sheriff's Office with proposed findings of investigations.

Shelby (Cramer) Iwatani – Community Engagement Manager

Shelby is the Community Engagement Manager. They lead efforts to expand awareness and increase community input that informs OLEO's work and recommendations. OLEO's engagement seeks to advance equity and social justice, build trusting relationships with the community, and provide inclusive and meaningful ways for all people served by the Sheriff's Office to influence decisions that impact them.

Katy Kirschner – Senior Policy Analyst

Katy serves as the Senior Policy Analyst. She provides programmatic and strategic leadership in policy review, including identifying Sheriff's Office policies that can be strengthened to better align law enforcement services with community expectations, and making recommendations for systemic improvements of the Sheriff's Office. The Senior Policy Analyst also conducts analysis of practices relating to law enforcement uses of force which enables OLEO to provide effective and timely review of community concerns of critical use of force incidents and investigations.

David Underwood – Investigations Analyst

David is the Investigations Analyst. He supports OLEO's monitoring of the Sheriff's Office IIU work. As the Investigations Analyst, he is deeply involved in all aspects of the investigation review process including review, analysis, and interview oversight.

Megan (Thal) Kraft – Policy Analyst

Megan is responsible for conducting systemic reviews and issuing conclusions and recommendations regarding Sheriff's Office operations, training, policies, rules, procedures, practices, and general orders related to the work of the oversight office.

Liz Dop – Office Manager

Liz is the Office Manager and develops operational best practices, tools, and standards that enable OLEO to perform its duties. Additionally, the Office Manager leads daily coordination of OLEO business support services, leads the management of records, and

serves as liaison with other departments and the public to ensure efficiency across OLEO teams to help achieve work priorities. The Office Manager also provides data management in support of OLEO's monitoring of the Sheriff's Office's Internal Investigations Unit work, and general administrative support for all staff.

OLEO's Jurisdiction

OLEO's jurisdiction is composed of all places served by the KCSO, including services in unincorporated areas of King County, King County Airport, Metro, Sound Transit, and the partnering contract cities of:

- Beaux Arts
- Burien
- Carnation
- Covington
- Kenmore
- Maple Valley
- Muckleshoot Indian Tribe
- Newcastle
- Sammamish
- SeaTac
- Shoreline
- Skykomish
- Woodinville

OLEO serves all people who live or work in these areas or use public transportation.

OLEO Ordained Powers and Duties

Figure 2 below illustrates the work that the current Ordinance assigns to OLEO.

Figure 2: OLEO Powers and Duties

Authority ¹	Description
Complaint Intake & Classifications	Review and consider complaints and concerns and refer the complaint to the Sheriff's Office with or without an intake classification recommendation
Investigations	OLEO may conduct independent investigations; however, OLEO is limited under the current CBA to only conduct investigations under the following circumstances: -KCSO Declines to investigate. -OLEO tells KCSO to conduct additional investigation and they decline. -Subject employee not covered by CBA.
Monitoring and Review of Investigations	Effectively monitor and review all KCSO internal investigations.

¹ Authority only refers to work that OLEO is currently able to do under the Charter, Ordinance, and Collective Bargaining Agreement.

Data and Administration	<p>Conduct data analysis and manage OLEO databases. Because the data is not integrated, OLEO deals with a lot of data entry needs that are above their current capacity.</p> <p>Administrative contacts with complainants and referral to services is an add-on to current responsibilities of our investigators.</p>
Reviews of Systems and Practices of the Sheriff's Office	In-depth reviews and audits of KCSO's systems and practices to identify systemic issues, concerning practices, and the reasons for them.
Community Engagement	Community engagement serves as the basis for OLEO's work and is a time-consuming affair requiring travel to various parts of the county, attendance at multiple meetings and events, and continued communications with stakeholders.
Policy Reviews and Recommendations	Policy Reviews are an essential way to achieve system-wide improvements in policing through the consistent evaluation and improvement of policies. This requires analyzing different policies, conducting research, evaluating alternatives and best practices, analyzing data, and drafting recommendations and policy language.
Reporting	Develop and publish reports related to the work of the oversight office, trends in police practices and the complaint handling process.
Annual Reporting	Develop an annual report that includes analyses, recommendations, and conclusions relating to all phases of the sheriff's complaint handling process, related findings, and final status of complaints.

3. Department Interviews

As part of the Discovery process, we interviewed all department members to understand more about department operations. The following questions were asked of every member of the OLEO team:

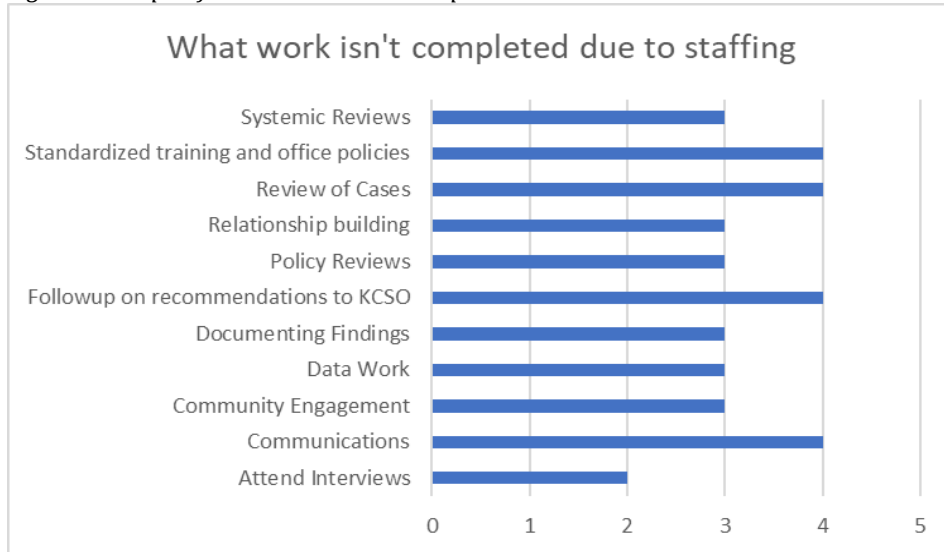
1. Tell me about your work history and experience.
2. What is your experience and job functions at OLEO?
3. What are your strengths?
4. Does OLEO work well together as a team?
5. Define your job duties, if not already documented in question 2.
6. Job duties neglected due to lack of staff.
7. What is the best thing about OLEO?
8. What is the worst thing about OLEO?
9. Does OLEO receive the support needed from Council?
10. If you could change one thing about OLEO, what would it be?

It is worth noting that the interviewees were all very willing and helpful in the process.

Findings of Interest

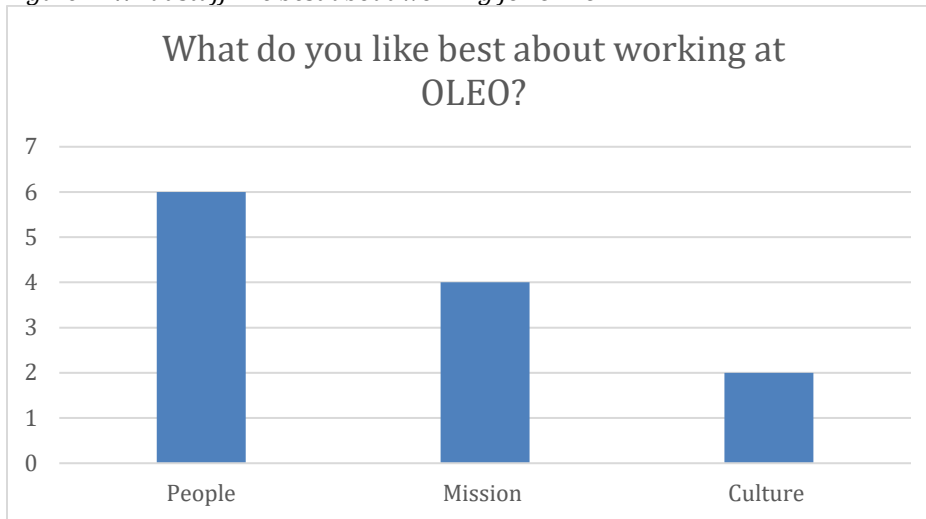
- When asked what job duties are neglected due to current staffing levels, staff shared the following:

Figure 3: Graph of what work is not completed



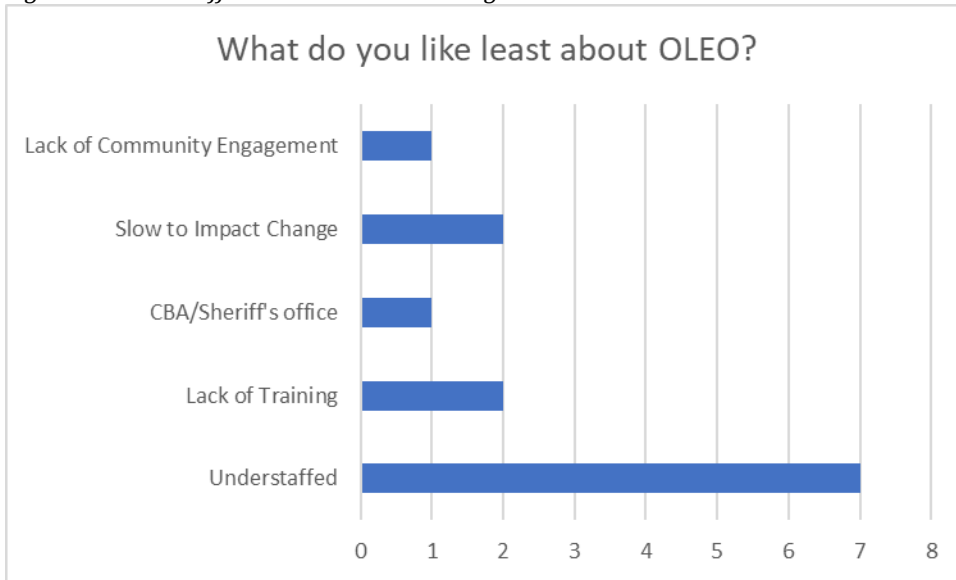
- When asked what they liked best about their job, staff shared:

Figure 4: What staff like best about working for OLEO



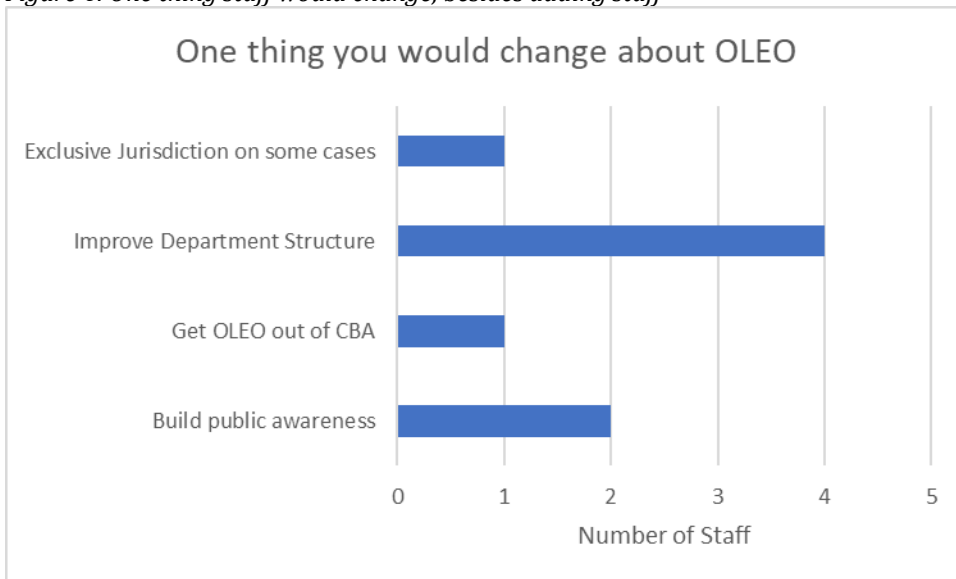
- When asked what they liked least about their job, staff shared:

Figure 5: What staff like least about working at OLEO



- When staff were asked what one thing they would change about OLEO (besides adding more staff) they shared:

Figure 6: One thing staff would change, besides adding staff



OLEO staff are committed to the work they perform. They are grounded in the mission, culture, and people of the department. Each OLEO staff member understood the negative impact that the current staffing levels have on their ability to complete all assigned work. There is frustration within the group. They all want to do their best work, serve King County and Community Members, but feel unable to do so as they are barely trading water in their current roles.

4. Comparative Organizations

ProjectCorps reached out to comparative agencies as part of this project. We interviewed the Policy Director, Matt Buttice, of the Denver Office of Independent Monitor and head of San Jose, CA's, Independent Police Auditor, Shivaun Nurre, J.D. We choose these two agencies as they are like OLEO in size, scope, and politics.

Figure 7. Comparative Analysis

	King County	Denver, CO	San Jose, CA
	Office of Law Enforcement Oversight	Office of the Independent Monitor	Office of Independent Police Auditor
Size of Agency Overseen			
	1,200	2200*	1,138
Staffing			
Director	1	1	1
Deputy Director	1	0	1
Investigations Monitor	1	1	0
Investigations	1	6	2.5
Systemic Review	1	0	0
Outreach	1	3	0.5
Policy/Reporting	2	3	1
Office Manager	1	1	0
Office Assistant	0	1	1
Total Staff	9	16	7
Responsibilities			
Classification	yes	limited	no
Certification	yes	no	no
Findings Review	yes	yes	yes
Policy Reviews and Reporting	yes	yes	yes
System Reviews	yes	no	no
Community Outreach	yes	yes	yes
Independent Investigations	limited	no	no

**While Denver supports both the Police and the Sheriff's, size 1,472/640 respectively, most of their work is focused on the police department.*

Both comparative organizations have fewer responsibilities than OLEO. Denver utilizes only lawyers for their investigative work and PhDs for all policy analysis work. They raised the pay rate for these positions to allow them to hire the talent they needed. They feel that this allows for a more high-powered staff that can get more done in less time. Both organizations felt adequately staffed for their current level of responsibilities.

5. Review of 2018 Staff Assessment

During this project, we reviewed the 2018 Staff Assessment Report completed by The Athena Group. That report indicated the additional staffing needs of OLEO at the time of that report was to increase the FTE count by 8.4.

When the 2018 Staffing Analysis was done, OLEO's duties were significantly less. Although the analysis was completed after the King County Council had expanded OLEO's duties, most of the new duties were restricted by collective bargaining; the current CBA was signed in February 2020.

We reviewed several factors that impacted the 2018 Assessment including:

- OLEO's duties at the time the 2018 analysis was completed, as restricted by the CBA then in effect;
- OLEO's current duties under the 2017-2021 collective bargaining agreement; and
- How the 2018 Staffing Analysis was deficient or inaccurate.

At the time, the 2018 Staffing Analysis was completed, OLEO: attended interviews and conducted certification review of completed KCSO internal investigations, conducted systemic reviews, attended scenes of critical incidents, began community engagement, began communications to the public (public awareness), and started reviewing KCSO policy changes.

Currently, OLEO's duties have more than doubled and have become more robust. OLEO now: reviews classifications of KCSO complaints before internal investigations begin, monitors and attends interviews, conducts certification review of completed KCSO internal investigations, reviews findings (dispositions) of completed KCSO internal investigations and drafts independent findings when appropriate, conducts systemic reviews, reviews policy changes KCSO makes, initiates some policy reviews/recommendations, attends scenes of critical incidents, monitors and attends interviews of internal investigations of critical incidents, conducts systemic review of critical incidents, conducts community engagement, and is still trying to increase public awareness. (Excluded from the list is independent investigations. Although OLEO currently is allowed to conduct such investigations, the duty is currently very limited, and OLEO has no capacity to undertake any investigation.)

When the 2018 staffing analysis was completed, OLEO's programs were less robust or too new, and since then OLEO has improved its programs:

- **Internal investigations certification –**
 - OLEO did not actively monitor investigations by discussing cases with investigators ahead of time, which they now do.
 - OLEO's criteria and documentation for certifying internal investigations is now more comprehensive, producing quality work, consistency, and transparency.
- **Systemic reviews –**

- Any in-house systemic review completed was limited in scope and data – mainly on trends/improvements to KCSO complaint processing.
- For larger systemic reviews, OLEO contracted with consultants and did not have full knowledge of how much staff/time was needed to complete reviews.
 - This 2022 assessment includes a more accurate estimate, derived by examining the Auditor’s office staffing and size of teams assigned to audits.
- **Review of policies and procedures –**
 - OLEO reviewed changes KCSO initiated, but did not initiate reviews on its own, which it does now.
 - OLEO did no community engagement on policy recommendations, which it has done on some recommendations since the 2018 analysis and endeavors to do more of moving forward by centering community input.
 - Some of the policy reviews OLEO initiate now are longer-term projects that are much bigger in scope and research than at the time of the 2018 analysis.
 - OLEO now provides analysis and input on external laws and policies, such as the state use of force laws and Attorney General’s model Use of Force policy.
- **Use of Force Incident reviews and analysis –**
 - OLEO had contracted out all Use of Force Reviews of Critical Incidents.
 - OLEO conducted no Use of Force reviews of non-critical incidents, which it wants and needs to do now and moving forward.
- **Community engagement –**
 - Community engagement was done more for public awareness or on a limited basis for specific projects when the 2018 analysis was completed.
 - OLEO’s current vision for community engagement has evolved into a co-creation/co-governance model, continually engaging impacted communities in a way that informs what OLEO prioritizes and shapes recommendations before OLEO makes them.

6. Findings and Recommendations

Clearly OLEO needs additional staff. OLEO does not have the infrastructure necessary and needs program management staff as well to oversee each of these programs. Current staffing allows no follow-up work. Program Management will allow for oversight and follow-up and allow the Director and Deputy Director to serve in their true roles and do less of the investigation and policy work. The recommendations below include management positions for the programs without managers.

Investigations

Includes case classification, certification, monitoring, interviews when needed and review of outcomes.

Current Staff: 2 FTEs; 1 Investigations Monitor and 1 Investigations Analyst

Work Output: In the first half of 2022, IIU completed 99 investigations, of which OLEO only had capacity to review 38/99. OLEO only has capacity to actively monitor approximately half of the investigations reviewed (19/99). OLEO only has capacity to attend interviews for approximately one third of the investigations they review (~6/99).

During this same time, OLEO completed no (0) investigations of their own.

Recommendation:

OLEO needs an additional 3-4 investigative staff to allow them to complete all the investigative work assigned to them. This will also allow the Investigations Monitor time to follow-up on recommendations and effectively monitor the caseloads (currently not being done).

Considerations:

Should the new KCSO CBA include provisions that mandate Body Worn Cameras (BWC) by the Sheriffs, this will double the amount of time for most investigation work (validated by both Denver and San Jose interviews). When BWCs are mandated, OLEO will require 2 additional investigative staff. Additionally, if the new CBA grants OLEO broader investigative power, they will require at least another 2 investigative staff to support this additional work.

Administration

Includes OLEO administrative work, data base management, office management, technical assistance and more.

Current Staff: One Office Administrator. (They have engaged a consultant to assist with database management including case entry as OLEO is not allowed to download data or access back-end data from the IIU's case management system. This was restricted via a previous CBA.)

Work Output: Due to current staffing level, the Office Administrator is unable to effectively do the work that they are assigned including:

- Administrative and Operations Support to Programs and Department Leadership (necessitating administrative work by Department Leadership).
- Communication responsibilities including copy writing, messaging, website development, and social media.
- Data Base management for all IIU cases. (Consultant working ~15 hours a week to support this currently.)
- Auditing of data.
- All things Finance and Budget.

Recommendation

ProjectCorps recommends that the current organization of this work be modified to allow for proper office and data management. We recommend that OLEO adds an additional role to administratively support their work. We recommend the following role be added:

- Administrative Assistant to support the current Office Administrator.

We propose that the data analyst work move under the new Deputy Director, Systems and Practices, responsible for data management replacing the contractor and expanding OLEO's ability to support all data analytics. This new FTE would also be responsible for the new Case Management System (to be implemented).

Additionally, we propose that the communication work is moved under Community Outreach and that a new role be created: Communication Specialist.

Review of KCSO Systems and Practices

OLEO's current ordinance directs them to perform in-depth reviews and audits of KCSO's systems and practices to identifying systemic issues, existing disparities, and the reasons for them.

Current Staff: 1 FTE; Policy Analyst.

Work Output: All previous systemic reviews were outsourced to consultants due to lack of staff. Having only one person limits ideas/perspectives and timeliness of review. If we look to the King County Auditor's office for comparison, they generally have 3 FTEs assigned to each audit and each audit takes on average 8 months to complete.

Recommendation:

This program is grossly under resourced. This work is critical to OLEO's ability to make important and informed reviews of KCSO systems and practices to help improve KCSO operations. The recommendation is to create a robust program for this work including the addition of a Deputy Director, Systems and Practices; one Systems Manager; and one Systems Analyst. This would allow OLEO to perform up to 3-4 systemic reviews per year in addition to review of ongoing trends and practice analysis.

Community Outreach and Engagement

Community engagement serves as the basis for OLEO's work and is a time-consuming affair requiring travel to various parts of the county, attendance at multiple meetings and events, and continued communications with stakeholders. OLEO also works directly with the Council appointed Community Advisory Committee for Law Enforcement Oversight (CACLEO). CACLEO is comprised of eleven committee members representing the geographic, ethnic, and economic diversity of King County's unincorporated areas and Sheriff's Office contract cities and seeks to represent all nine King County Council districts. OLEO supports CACLEO's monthly meetings.

Assigned Staff: 1 FTE; Community Engagement Manager

Work Output:

The Community Engagement Manager works directly with CACLEO, other organizations, and groups. They have no time to interface with the community directly, nor do they have the resources needed to expand upon the CACLEO meetings to include other community members. They are unable to do additional outreach and engagement.

Recommendation:

We recommend that OLEO adds a Community Engagement Specialist which enables them to have more of an impact in the community by allowing for increases in OLEO's attendance at events, ability to handle administrative details, and management of small contracts with community organizations. This additional resource also allows the Manager to focus on OLEO's presence in the community and participate in existing meetings held by King County.

It is also recommended that the new Communications Specialist report to Community Outreach and Engagement. The addition of a Communications Specialist will allow for communication plans and strategies to engage the community. This role will also standardize the 'voice' of OLEO and allow for consistency in all communications.

Policy

Policy Reviews are an essential way to achieve system-wide improvements in policing through the consistent evaluation and improvement of policies. This requires analyzing different policies, conducting research, evaluating alternatives and best practices, analyzing data, and drafting recommendations and policy language. The current ordinance indicates that the OLEO Policy team review and make timely recommendations to the sheriff regarding changes to sheriff's office policies, rules, procedures, or general orders. It is the policy of the county that KCSO consults with OLEO before implementing changes to all general orders, as well as policies and procedures relating to administrative investigations and reviews, unless prior implementation is deemed necessary to address urgent circumstances.

Current Staff: 2 FTEs, 1 Policy Manager and 1 Policy Analyst.

Work Output: OLEO is currently reviewing policies, but not completely or efficiently. They do not review all KCSO policies. State policy changes can take months to review. They are currently unable to do any follow-up work which means that they cannot know if the policies are updated based on their recommendations to KCSO.

Recommendation:

Like many of the other programs, the policy program is understaffed. To support OLEO properly we recommend that they add 2 Policy Analysts. This will allow OLEO to review more KCSO policies, make recommendations and follow-up on recommendations, and look

at new trends and what other jurisdictions are doing, in order to make strong recommendations to KCSO.

Reporting/Data Analysis

The ordinance mandates that OLEO will develop and publish reports related to the work of the oversight office, trends in police practices and the complaint handling process using data analysis.

Current Staff: 0 FTEs.

Work Output: N/A

Recommendation:

Without data analysis staff, this important work cannot be completed. OLEO needs to be able to assess the work that they do and the impact to KCSO and the community. This work is critical as it allows reflection and the ability to modify practices, processes, and actions. The recommendation is to have this work report up to the new Deputy Director, Systems and Practices, adding a new Data Analyst/Statistician role.

Recommended Additional Staff for OLEO

Figure 8: Recommended Additional Staff

Area	Current Employees	Additions Recommended	Additional Roles
Investigations	2	3	2 Investigators, 1 Investigations Analyst
Community Engagement	1	2	1 Community Engagement Specialist, 1 Communications Specialist
Policies	2	2	2 Policy Analysts
Systemic Reviews/Auditing	1	2	1 Systems Analysts reporting to new Manager, Systems and Practices
Reporting and Data Analysis	0	1	1 Data Analyst reporting to Deputy Director, Systems and Practices
Administration	1	1	1 Administrative Assistant
Executive Management	2	1	1 Deputy Director, Systems and Practices
Total Employees	9	12	

7. Summary

The King County Office of Law Enforcement Oversight is a vastly talented group of highly effective, productive team members that feel supported by their management and teammates. They are unanimous in their thoughts regarding insufficient current staffing levels. They are consistent in wanting to provide King County with excellent oversight of KCSO. Increasing the staff and modifying the overall structure will enable OLEO to do the work that they are ordained to do, create an impacting dialogue with community members and fulfill their responsibilities to King County.

Figure 9: Proposed OLEO Organization Chart

