



**POLICE TRAINING DIVISION:**  
Progress made, but evaluating impacts on officer  
performance must be improved

March 2015

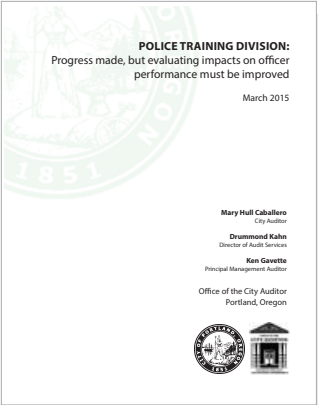
**Mary Hull Caballero**  
City Auditor

**Drummond Kahn**  
Director of Audit Services

**Ken Gavette**  
Principal Management Auditor

Office of the City Auditor  
Portland, Oregon





**Production / Design**  
Robert Cowan  
Public Information Coordinator



# CITY OF PORTLAND

Office of City Auditor Mary Hull Caballero

## Audit Services Division

Drummond Kahn, Director

1221 S.W. 4th Avenue, Room 310, Portland, Oregon 97204

phone: (503) 823-4005

web: [www.portlandoregon.gov/auditor/auditservices](http://www.portlandoregon.gov/auditor/auditservices)



March 3, 2015

To: Charlie Hales, Mayor  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Steve Novick  
Commissioner Dan Saltzman  
Chief Larry O'Dea, Portland Police Bureau

From: Mary Hull Caballero, City Auditor

Subject: Audit Report – *Police Training Division: Progress made, but evaluating impacts on officer performance must be improved* (Report #457)

The attached report contains the results of our audit work on the Portland Police Bureau's Training Division. The response letter from the Police Chief is included.

We ask the Chief of Police to provide us with a status report in one year, through the Commissioner in Charge, detailing the steps taken to address our audit recommendations.

Mary Hull Caballero  
City Auditor

Audit Team: Drummond Kahn  
Ken Gavette

Attachment



# Table of Contents

<b>Summary</b> .....	1
Chapter 1	
<b>Introduction</b> .....	3
Chapter 2	
<b>Training to policy and procedures</b> .....	7
Chapter 3	
<b>Bureau efforts resulting from DOJ findings and agreement</b> .....	15
Chapter 4	
<b>Other issues - Armory internal controls and procedures for conducting training reviews</b> .....	25
Chapter 5	
<b>Recommendations</b> .....	31
Chapter 6	
<b>Audit objectives, scope and methodology</b> .....	33
<b>Response to the Audit</b> .....	35



# Summary

The Portland Police Bureau's Training Division is responsible for providing and coordinating the training for over 900 Portland police officers. It is also responsible for maintaining training records, reporting to the Oregon Department of Public Safety Standards and Training, and for informing individual officers and Bureau managers of those who need training or who have failed to meet standards.

Police officers operate in a complex technological, legal and social environment where training is imperative for their safety and for public safety.

The Bureau as a whole, and the Training Division in particular, are under increased scrutiny since the U.S. Department of Justice (DOJ) found a "pattern or practice of excessive force used against mentally ill persons." Improved training methods was a focus of the initial DOJ report and a subsequent agreement between the City and the DOJ.

Although it is not the purpose of this report to present the status of Bureau work on DOJ issues, we used the DOJ agreement to examine parts of the training organization and their efforts. As a result, we found that many improvements have been made since the initial DOJ report. The Training Division has been at the center of many of these improvements, including the creation of a Behavioral Health Unit and the expansion of crisis intervention training to a voluntary specialized group.

In addition, the Training Division has become a more professional training organization by reorganizing to include staff trained in curriculum development and training program evaluation. Even though staff has not had time to complete an entire training and development cycle, plans appear to be on track to meet most of the elements

of a well-run training operation, including conducting needs assessments and evaluations of training effectiveness. A new training facility provides an opportunity to improve scenario training.

We note, however, that there are opportunities to improve certain aspects of the training program to better meet Bureau policies, goals and objectives. For example, in some cases the Bureau is quick to respond to important events by changing policies and procedures and developing and offering new training. However, we found the training emphasis sometimes subsides after an initial flurry of activity. Despite initial efforts by the Division to improve evaluation, there is currently little done to feed real-world outcomes (that is, the degree to which the training programs fulfill policy objectives and improve officers' on the job performance) back to the Training Division in a comprehensive, systematic way.

More work also needs to be done to fully address other issues such as keeping records for outside training classes, improving status reports on training programs submitted to management, consistently providing de-escalation training scenarios, and providing more training on procuring medical care for subjects and on officer use of profanity. Improvements could also be made in check-out procedures for weapons at each precinct to ensure officers have the proper training for the weapons they carry and in how the Training Division conducts use of force analyses.



# Chapter 1 Introduction

Police training is critically important – training police officers allows law enforcement agencies to convey technical, procedural, and legal topics to individual officers, helping ensure a consistent approach to policing in the community. In Portland, police training is planned, coordinated, and often conducted through the Police Bureau’s Training Division.

## **Background**

The Training Division is a part of the Services Branch of the Portland Police Bureau. Its mission is to provide the Bureau’s more than 900 officers with relevant and timely training to ensure they have the skills to perform their duties, which are complex and subject to frequently changing legal and social environments. The Division does not facilitate training for the 217 non-officer employees of the Bureau.

More specifically, the Division is responsible for providing officers with the appropriate training to meet all Bureau standards and policies and for maintaining the records of that training. In addition, an important function of the Division is to provide technical advice to the Use of Force Review Board and to conduct written analyses of serious use of force incidents. These reviews focus on tactics, policies, the level of force used, and the training provided to the officers involved.

The Division currently operates with a staff of 18 permanently assigned staff and a large group of officer-instructors who are brought into service periodically, depending on their skill set and the specific objectives for a training session. The Training Division’s adopted budget for FY2014-15 is \$5.7 million.

A new training facility recently opened, with over 60,000 square feet of available space at a cost of approximately \$15 million. This new facility, which includes a modern shooting range, a “scenario village” with large scale streets and buildings, classrooms and driving areas, consolidates the training needs of officers and fills a long-standing need. The building was financed through a bond issue.

### **Officer Training**

The initial training to become a Portland police officer is a lengthy process consisting of several phases, usually taking at least eighteen months. In addition, all officers must attend annual In-Service training.

#### **Basic Academy**

This training phase is run by the Oregon Department of Public Safety Standards and Training (DPSST) and is conducted at their Salem facility. Over 16 weeks, officer trainees receive an introduction to basic police duties and techniques, including patrol techniques, firearms, less lethal weaponry, use of force, legal context for their duties and actions, cultural awareness, defensive tactics and more.

#### **On the job training**

After Basic Academy, the Bureau prefers to give trainees about 20 weeks on-the-job training with a coach before sending trainees to the next formal training phase. The length of on the job training after Basic Academy depends on the timing of the hires and the timing of both the Basic Academy and the Advanced Academy.

#### **Advanced Academy**

The Bureau works with the State to coordinate training courses for the Advanced Academy. This is a 12 week, full-time course where trainees are taught more advanced skills in areas covered in the Basic Academy. In addition, 28 hours are devoted to Crisis Intervention Training (CIT), dealing with persons in mental crisis. This is an ongoing issue with the Bureau and is the primary subject of the recent agreement for organizational changes made with the U.S. Department of Justice. We will discuss this in more detail in Chapter 3.

---

### **More field training**

After completing the Advanced Academy, trainees are sent back into the field for patrol duties with a coach.

### **In-Service Training**

State law requires officers receive 84 hours of training every three years. Twenty four hours (eight hours annually) must be in use of force issues. The other 60 hours can be in various issues such as communication, CPR, driving tactics, legal and risk management issues, etc. The Bureau conducts annual in-service training that meets or exceeds those requirements. The Training Division maintains records of officer attendance and reports these to the State DPSST, which also keeps on-going records and reports back to the Bureau if they note any deficiencies in individual officer training.

### **Crisis Intervention Training (CIT)**

The Training Division (specifically the Curriculum Development team) has worked with the Behavioral Health Unit to develop and implement training programs instructing officers in dealing with persons in mental crisis. All officers receive initial CIT as part of the Advanced Academy. Beyond that, officers who volunteer for more CIT become part of the Enhanced CIT (ECIT) program. As of October, 2014, 78 active officers were ECIT qualified.

### **Other training**

The Training Division does not offer training for many areas of specialty within the Bureau, such as crowd control, explosives and investigations. Officers are expected to report all such training along with training curriculum to the Training Division. This information is kept in individual training files. This audit did not assess the quality or extent of training for these specialized groups. We found no specific criteria to allow for such an evaluation. We suggest future audit work in this area by engaging a subject matter specialist in these operations.

**U.S. Department  
of Justice (DOJ)  
agreement**

In 2012, the DOJ concluded a study that found reasonable cause to believe the Portland Police Bureau engaged in a pattern or practice of unnecessary or unreasonable force when dealing with people who have or are perceived to have mental illness and those who are tasered. The DOJ study concluded that this pattern was the result of deficiencies in policy, training, and supervision. The study also contained suggestions for remedial measures, many of which were focused on improved officer training. These remedial measures were subsequently folded into a formal agreement between the City and the DOJ to take specific actions.

The Agreement was drafted in 2012, but was not formally approved by a U.S. District judge until August 2014. According to the Bureau, work proceeded on items in the initial report even before the agreement was drafted. Some of these improvements included establishing the Enhanced CIT program and the Behavioral Health Unit (specializing in assessing, monitoring and assisting persons with mental health needs). The Training Division was also reorganized to include professionals in curriculum development and enhanced training evaluation techniques.

Many of the requirements set forth in the Agreement reflect the basic elements of a well-managed employee training function, which we describe in the next section.

**Elements of a well-  
managed training  
process**

Training is a critical part of the policing function. Good training techniques act to transfer the information and intent of policies, the law, and social expectations on the street, where officers are sometimes faced with dangerous and fast moving situations. It is important that police operate in a professional training environment. That includes:

- Conducting a needs assessment
- Implementing the training program by designing, developing and implementing training activities
- Evaluating training effectiveness

The DOJ agreement incorporated much of this into the agreement with the Bureau. Therefore, if the Bureau meets the DOJ agreement requirements, they will likely be meeting these elements. We reviewed progress toward these requirements as part of our review.

## Chapter 2 **Training to policy and procedures**

Implementing Bureau policy and doctrine is an important part of the training process. Incorporating changes in the law and recognizing when training needs to be conducted based on officer performance in the field, or on large legal damages paid by the City for officer actions, is critical.

We would expect to see a link between important incidents and policy changes, implementation of an appropriate training program, and evaluation of the training provided.

In some cases, the Bureau has been swift to make policy changes in response to incidents and to subsequently provide training classes, tips and techniques bulletins, and videos. In some cases we reviewed, however, the training emphasis on important and costly issues subsided after an initial flurry of activity. Consistent training emphasis over time on major cases, and evaluating the training's effectiveness, could reduce the chances of recurring incidents.

From our review, we conclude the Bureau is generally good at assessing the need for change and implementing training programs, but falls short on evaluating the impact of that training on officer performance and public safety. Despite the fact that several of the policy initiatives we reviewed resulted from large litigation payouts and/or from tragic loss of life, the Bureau was not able to readily produce any evidence they measured the outcomes of the training efforts as part of a systematic, comprehensive training process. This important link must be addressed in order to effectively implement policies and affect lasting organizational change. We understand that the Training Division's staff is developing evaluations of specific programs such as ECIT but measuring outcomes should be a part of ongoing training and general management processes.

**Background**

Changes in the legal environment, public expectations, and technology create challenges for police training. The Training Division is expected to equip officers with the knowledge and experiences to seamlessly incorporate hundreds of policies and procedures into their daily jobs. The most recent on-line edition of the Manual of Policy and Procedures, dated January 2009, is more than 600 pages. This manual is the accumulation of Bureau-wide directives and is revised infrequently. Between revisions, other procedural instructions on a wide variety of topics are adopted through Executive Order from the Chief and via Standard Operating Procedures. SOPs are more focused on individual units within the Bureau. Regardless of whether a change is issued through a directive, an SOP, or an Executive Order, officers are expected to follow it, and the Training Division is expected to impart the knowledge necessary for the officers to perform to expectations.

The Training Division does this through formal training (Advanced Academy and In-Service training), the Tips and Techniques and Safety Bulletins, and video productions.

We chose four examples of major changes to policies and procedures as case studies to follow through the training and implementation process. These examples represent important changes to the way officers are expected to perform, and in several cases were precipitated by public notoriety, significant injury or litigation.

In each case, we asked the Training Division to provide information on the precise policy wording change, what the change was intended to accomplish, whether there was a precipitating event, how the change was integrated into training, and whether evidence from the field showed that the training produced demonstrated changes in the way officers performed their jobs.

We selected and provided contextual information on these policy changes. Bureau staff did not provide examples of structured evaluations as to the effectiveness of any of the training.

---

### **Medical transport**

On September 17, 2006, James Chasse died while in police custody. After a struggle between Mr. Chasse, two police officers and one county deputy, an ambulance was called and then sent away. Police then transported Mr. Chasse to the Multnomah County detention facility, where staff refused to book him. Mr. Chasse died en route to a hospital. In May 2010, the City settled a wrongful death claim with Mr. Chasse's family.

Within four months of the initial incident, Police Chief Sizer issued a new directive on emergency medical transport. The new directive detailed the handling of subjects who require medical care, including how to identify someone who needs care, who to notify, and how to deal with and document interactions with staff at the county detention facility. Subsequent updates to the policies and procedures have included an Executive Order in 2009, a Tips and Techniques bulletin in 2011, and an Executive Order in 2013.

The 2009 Executive Order made an important clarification as to responsibility for caring for subjects. It specifically stated that EMS personnel at the scene will determine the course of medical treatment, not the officer, and that a subject in custody will not be able to refuse transport or leave while in custody. A City Attorney who frequently works with the Bureau provided slides from a presentation on this subject he made to officers in 2009. It detailed officer responsibilities.

While these new procedures take most of the decision-making as to ultimate responsibility out of the hands of the officer and seems to simplify an officer's task, important elements of the officer's responsibility are still in place. For example, the officer must determine whether medical attention is needed in the first place and fulfill all the duties and documentation outlined in the initial Directive.

The Bureau reported that there has not been a Roll Call video on this subject since 2008, and only the above-referenced 2011 Tips and Techniques Bulletin served as written training documentation. Training staff were unable to find lesson plans or recall any In-Service presentations for this material.

### **Less lethal weapons and storage of ammunition**

On June 30, 2011, a Portland police officer mistakenly loaded his beanbag shotgun with lethal rounds and wounded a man. The day after the shooting, the Mayor called the shooting a tragic mistake.

In July 2011, a Special Order was issued requiring all officers certified to use less lethal weapons to attend a special in-service training class to update information on policies and procedures. The training included a precaution to officers to visually inspect less lethal rounds to confirm they are using the correct types of ammunition.

Within four months of the incident, in October 2011, an Executive Order was issued by the Acting Chief specifically detailing where less lethal rounds would be stored, requiring that officers visually inspect each round as they load them, and encouraging officers to have a second officer view and confirm the inspection.

According to Bureau staff, in addition to the July 2011 In-Service update class, two less lethal initial certification classes were conducted in 2012. In both of those classes, a copy of the Executive Order was distributed and discussed. Staff informed us that as an additional precaution officers are no longer authorized to carry both a less lethal and a regular shotgun.

There have been no training documents, lesson plans or reminders distributed since 2012.

### **Vehicle pursuits**

Vehicle pursuits are one of the most dangerous activities for patrol officers. Automobile crashes are a major cause for injury and property damage. According to an internal Bureau report in 2013, there were 120 pursuits. Almost one quarter of those resulted in some sort of crash.

Major changes to the vehicle pursuit policy were made in 2006 and 2007 by Executive Order. New language included consideration of the value of human life, that officers should terminate a pursuit unless the offense is person-to-person violence, and that the benefits to capture should outweigh the risks involved. Specific changes were also made to the application of pursuit intervention tactics such as



---

spike strips and maneuvers where an officer touches bumpers with a suspect's car, trying to get the suspect's car to stop after going into a spin.

Patrol Vehicle Operations (PVO) are a frequent part of in-service training. The Training Division told us that in eight years of In-Service training classes since the 2007 changes, five years have included a PVO component. The Bureau provided one lesson plan for this report, which was for the 2007 session. It included detailed discussion (one hour classroom) and practical (3 hours) training. The classroom instruction included risk analysis, stressed public safety and ways to terminate pursuits. A broad policy goal was presented to prevent and end pursuits as soon as possible.

No other lesson plans were provided, so we could not assess the degree to which these values continue to be taught to officers. The spring 2014 In-Service Training lesson plan showed that the PVO practical driving component was not related to pursuit, but rather focused on techniques for safely backing a patrol car.

Although there are no Training Division evaluations of the effectiveness of this training, a standing group called the Vehicle Pursuit Committee keeps statistics on vehicle matters and produces periodic reports and recommendations to management. An internal 2013 report by the Vehicle Pursuit Committee showed positive progress in that the duration of pursuits was down by about 23 percent since 2007, and the number of pursuits terminated was up by almost 23 percent.

### **Use of Force**

Perhaps no single issue impacts the Bureau at all levels more than the use of force. The central issue of the DOJ report and subsequent Agreement revolves around the use of force; how the decision is made to use force, and what type and level of force is applied. The external environment, most notably constitutional law, provides the context for the Bureau's policies on the use of force. While constitutional rulings have set minimum standards, local experiences have driven additional procedural restrictions on the use of force by Police Bureau officers.

The major changes since the early 2000s came in 2007 and 2013, both precipitated by officer-involved shootings. Prior to 2007, the Bureau mostly relied on what is referred to as the "Graham standard."

This basically gives officers the authority to use the amount of force reasonably necessary given the totality of circumstances occurring in an incident.

In 2005, a high profile officer-involved shooting in which Mr. Raymond Gwerder was shot and died eventually cost the City \$500,000 in a legal settlement. Before the settlement, the police chief had already substantially revised the use of force policy to say that the Bureau places high value on resolving confrontations with less force than allowed by law, and using de-escalation tools. The new policy contained the bureau expectation that officers, over the course of their careers, display the skills to regularly resolve conflicts without resorting to higher levels of force.

In 2010, another high profile officer-involved shooting in which Mr. Aaron Campbell was killed prompted further changes after a large settlement was paid. In 2013, an Executive Order was issued significantly revising the prior directive and the definition of satisfactory performance. The revised directive described the constitutional limits of use of force and specifically stated that the Bureau's force policy is intended to be more restrictive than the constitutional standard. In addition, the Chief adopted a definition of satisfactory performance, which required officers to make confrontation management decisions based on methods reasonably calculated to end the confrontation safely, with as little reliance on force as practical. An officer's performance would be judged on whether they pursued this goal of confrontation management.

Use of force law, policy and practical application is a significant part of both Basic and Advanced Academies. The State requires 24 hours of training every three years in use of force issues. These hours and attendance is reported to the State DPSST. The Bureau covers this requirement with at least eight hours of In-Service training annually.

---

Our observations of the Spring 2014 In-Service training included a 90-minute presentation in which a City Attorney focused on use of force. Most of this presentation was about actual cases, how they were litigated and what impacts they might have on the everyday performance of officers' duties. The largest single block of time was spent describing a \$9 million settlement case where an officer decided to disengage from a potential confrontation. The subject was later involved in a fatal car crash.

Other settlements were discussed, but it was the consensus in each case that there was little officers might have done to change the outcomes.

Separately, approximately 20 minutes of the training was spent specifically on the use of force policy. The presenter emphasized that under the policy, officers would be judged on the circumstances at the time of the incident, how they made the decision to apply force, and the rationalization for the methods they chose. The training class did not spend much time on the overall standards because, according to the instructor, participants were well aware of the policy as it was covered in the 2013 In-Service training. However, this assumption may not have been warranted. In the 2014 In-Service Defensive Tactics training class we observed, none of the twelve participants could correctly articulate the Bureau policy on when to use force when they were asked by the instructor. We observed that the instructor used this as a teachable moment to refresh officers on the policy. In a subsequent conversation with one of the instructors, we were told that only one person in any of the prior classes correctly answered the question.

An officer is currently assigned to the Chief's office to review all use of force reports and make recommendations to the appropriate officials concerning further review or potential training issues. While this is an appropriate start, we recommend the Bureau institute a systematic, comprehensive process to evaluate training and policy effectiveness (see Recommendations #8 and #9).



## Chapter 3 **Bureau efforts resulting from DOJ findings and agreement**

The Bureau has made significant progress in addressing many of the concerns presented by the DOJ and the subsequent Agreement, despite being in only the beginning of what both sides agree is a multi-year process. Major efforts, such as expanding Crisis Intervention Training and creating the Behavioral Health Unit, are well underway. Specific elements of the Agreement have also been implemented, such as designing a program to assess training needs and to evaluate some training effectiveness. Although not fully implemented, these efforts appear to be on track. More work needs to be done to address other issues, such as record keeping for outside classes which are not sponsored by the Training Division, improving the information on training programs submitted to management, remaining aware of the need to consistently provide de-escalation scenarios during In-Service instruction, and to provide more instruction on procuring medical care for subjects and on discouraging officers use of profanity.

### **Background**

In September 2012, the U.S. Department of Justice announced the findings of a year-long investigation into Portland Police Bureau officers' use of force against persons with mental illness. Very soon after, the Bureau drafted an agreement with the DOJ to address the findings and recommended remedial measures.

### **Systemic deficiencies reported by DOJ**

The report pointed to a systemic deficiency in responding to persons with mental illness or in mental health crisis. The authors listed two primary causes of this deficiency, each of which is tied directly to training:

- a lack of officers specially trained in and proficient at responding to mental health crisis

- a lack of strategic disengagement protocols involving consultations with mental health providers

The report says that the initial 40 hours of crisis intervention training given to all officers is inadequate to address the issue. DOJ reports a growing amount of evidence suggesting that the best responders are officers who volunteer for additional training and who have expressed a distinct desire to specialize in responding to those in mental health crisis.

The report also cites observed examples of officers employing strategic disengagement – a practice of withdrawing from a situation to avoid use of force when a subject does not appear to be in imminent danger to themselves or others. However, the report suggests that officers should only practice strategic disengagement in consultation with a mental health professional. It notes that there were no specific protocols for handing the situation off to a mental health professional when appropriate.

### **Articles of the Settlement Agreement**

Suggested remedial actions led to the development of a list of specific actions agreed to by the Bureau. As noted earlier, this Agreement was drafted in 2012 but was only recently (2014) formally approved by a Federal District Judge. The Bureau had already begun work on many of these items as we began our audit work. Because the basic concepts of both the suggested remedial actions from the original DOJ report and the specific items from the Agreement constitute many of the elements of a well-managed training program, we reviewed each of the training-related items in the Agreement.

*Note: This audit was not conducted to pass judgment on whether the Bureau is living up to its agreement to DOJ, but rather to act as a framework for evaluating the Training Division as a model organization.*

The respective numbers in the section below reflect the Article numbers from the Agreement which are training related and includes a brief summary of Bureau efforts on each item along with our evaluation. We have included recommendations on each article in Chapter 5 – Recommendations – as appropriate.

---

**Article #79.**

**The Training Division shall review and update the training plan annually, using information from a needs assessment.**

The Training Division has become more professionalized in general with a reorganization adding four positions dedicated to curriculum development and training effectiveness. One Training Development Analyst was hired specifically to conduct a needs assessment and develop an evaluation process. Although a needs analysis has yet to be completed, the analyst has developed a detailed plan to approach the assessment. The plan includes reviewing misconduct complaints and problematic uses of force, law enforcement trends, and reviewing input from all levels of sworn officers. The Training Division has produced a detailed report of the effectiveness, usefulness and need for future training in the Enhanced CIT program. This information will be used to develop a strategic plan.

**Article #80.**

**The Bureau shall develop and implement a process for the collection, analysis, and review of data regarding the effectiveness of training.**

One of the Training Development Analysts is being trained and certified in the industry-standard technique for training evaluation: the Kirkpatrick model. The Kirkpatrick model emphasizes a scientific approach to evaluating training. It focuses on how the trainees felt about specific training, what they learned, the amount of knowledge transferred and how the training changed behavior of officers on the job. The Bureau has produced one detailed report on the effectiveness of 2013 Enhanced CIT, and one report on the effects of mandatory bureau-wide CIT. The Division is working on evaluations for 2014 Enhanced CIT and from the 2014 Advanced Academy.

In addition, the curriculum development group is working on improving scenarios and program evaluations using approaches modeled on those used by the Federal Law Enforcement Training Center.

As discussed in Chapter 2, however, these efforts need to be expanded to include the evaluation by the Training Division of real world outcomes and officer performance on important policy initiatives.

**Article #81.**

**The Training Division should electronically track, maintain and report complete and accurate records for curricula, attendance and other records of training material in a central, organized file system.**

The Training Division keeps records on a database system acquired about 10 years ago called Skills Manager. Training staff enters information in manually from paper rosters from training classes. Reports can be generated by officer and by type of training received. Reports are generated quarterly and forwarded to the State DPSST. In addition to State and Bureau-mandated training for all officers, the Division keeps records for Enhanced CIT, and specialty certifications such as Tasers, less lethal weapons, the AR-15 rifle, etc. Lesson plans for In-Service training are also kept by the Division. We obtained a number of lesson plans from past In-Service, Enhanced CIT and Advanced Academy trainings for review.

We found Training Division staff were able to produce records we requested easily through a relatively robust query process. One weakness in the system, however, is a lack of data base search capabilities for training that does not fit neatly into State and Bureau-mandated training or into classes developed by the Training Division. This includes specialty training in areas such as explosives, drugs and vice, investigations, forensics and other specialized topics. (See recommendation #1)

We reviewed the procedures for transferring the knowledge base of officers who are certified in various weapons to the precincts to ensure officers who have access to those weapons have received the proper training. We discuss this in the next chapter.



---

**Article #82.**

**A report on training should be made to the Assistant Chief of Operations semi-annually.**

The report is to include training “delivered and received.” The Training Division reports they have delivered one semi-annual report to the Assistant Chief’s Office.

In response to our request for this report, the Bureau submitted to Audit Services a listing of courses and attendees, which technically may meet the terms of the Agreement. As a management tool, however, the report is not useful. The report does not provide any analysis of the information or give any indication as to how the training “delivered and received” furthers Bureau training policy, goals, objectives, or officer and community needs. (See recommendation #2)

**Article #83.**

**The Bureau should institute guidelines to govern its selection of officers who serve as trainers to ensure the officers do not have a history of using excessive force.**

The Bureau adopted S.O.P. 1-19 in 2014, outlining the procedures by which Training Division instructors are selected. These standards require that instructors have no disciplinary actions in the past three years based upon the use of force or mistreatment of people in mental health crisis.

**Article #84.**

**Training should:**

1. increase role-playing scenarios that illustrate how to handle people in mental crisis, emphasize the use of de-escalation techniques, continue to train on problem-solving and disengagement or delaying arrests.

The Bureau has put much emphasis on this recommendation in the past few years. But based on our observation this emphasis has not been consistent. For example, the Advanced Academy and 2013 In-Service

training program emphasized de-escalation and related scenarios. However, our observations and reading of lesson plans for the 2014 In-Service training program shows less emphasis.

Bureau staff pointed out that they have limited hours for In-Service training and scenarios must be carefully balanced to present a wide range of possible events for officers to respond to. They reported to us that not all scenarios can or should involve handling persons in severe mental crisis.

### **Advanced Academy, Enhanced CIT and 2013 In-Service offered many scenarios**

Significant time has been spent during the Advanced Academy on dealing with persons in mental crisis (40 hours of classroom time specifically on Crisis Intervention Training). Our review of lesson plans from 2013 showed an emphasis placed on de-escalating situations and for using the least force necessary to achieve an objective.

Also during the 2013 Advanced Academy, officers were exposed to very detailed approaches for deciding when and how much force to use in given situations. This included lectures on the law, City policy and an emphasis on continually assessing how much force may be needed and being able to ramp up or down quickly, employing less force than the law allows.

Also, during the 2013 In-Service training, three scenarios were presented to officers. Officers were expected to rely heavily on communication skills to handle these situations in which people were in severe mental crisis. In each scenario, officers were judged partially on their ability to control the situation with the least force necessary and to use de-escalation techniques if appropriate.

In addition, Enhanced CIT gives volunteer officer participants significant exposure to the concepts of disengagement. We reviewed lesson plans and also observed significant classroom time devoted to mental health assessment, intervention, resources, containment and communication.

---

### **2014 In-Service training, however, offered fewer opportunities for disengagement experience**

Our observation of In-Service training in Spring 2014 showed few role-playing scenarios for officers in handling persons in mental crisis or methods of disengagement. For example:

- During this 2014 In-Service training, there were two basic scenarios. One emphasized an officer's response when under stress and attack while initially seated in their patrol vehicle, "reinforcing their ability to draw their sidearm quickly and safely confront an aggressor...and have the opportunity to fire on the ground and over and under objects". This consisted of an officer in a vehicle being approached quickly by (in most cases) a very aggressive person, with little chance for confrontation management, and in most cases we observed, officers fired their weapons. (see figure 1)
- A second scenario gave, according to the training agenda, "the opportunity to engage with aggressive suspects in dangerous and potentially lethal situations." We observed that officers were approached on the street by an agitated man, but one who did not appear dangerous in any way or in serious mental crisis. Officers were expected to act calmly. This did not appear to be an exhaustive test of handling someone in severe mental crisis as had been used in the 2013 In-Service training cited above.

Bureau staff explained that even though neither scenario presented an opportunity to constructively engage with a mentally ill person, they nonetheless gave officers an opportunity to engage with a person under great stress. Officer performance was judged in relation to the aggressively violent events played out in scenario one above.

- Also, based on our review of over one hundred pages of material from 2014 In-Service lesson plans, these documents make very few references to the terms "disengage," "de-escalation," or "walk away". (see recommendation #3)

**Figure 1** 2014 In-Service Training scenario



Officer above engages one of three possible surprise scenarios.

Source: Audit Services Division observations and photographs of 2014 Portland Police Bureau In-Service training



---

**Article #84.**

**Training should: (continued)**

2. describe how force events could lead to civil or criminal liability,

Our observation and review of 2014 In-Service Training included detailed charts and analysis of liability claims and risk factors for officers involved in use of force situations. A City Attorney spent time discussing the law, City policy and actual court cases. Also, Advanced Academy has time devoted to use-of-force law and decision-making.

3. continue to provide training on an officer's duty to procure medical care for a subject who is injured,

According to information presented to us by Bureau staff, a Roll Call video in 2008 and a Tips and Techniques Bulletin in 2011 were the last materials Training staff could locate. Staff also noted training in which officers used ballistic shields to approach and obtain medical care for wounded persons. They stated this technique has allowed for quicker medical response for individuals. No recent In-Service training has been produced covering the procedures for obtaining medical care which were changed following Mr. Chasse's death. This was discussed in more detail in Chapter 2. (see recommendation #4)

4. continue to train officers not to use demeaning labels and non-proper comments,

No formal training is designed to address this issue. Training Division staff told us that it is sufficient to meet this item by requiring all officers to read the Agreement and to address negative behaviors if they occur in training. Bureau staff told us that a 2013 In-Service lecture on BHU services included discussions about avoiding the use of demeaning terms for mentally ill persons. (see recommendation #5)

5. provide additional training to supervisors on how to conduct use-of-force investigations, evaluate officer performance, and impose appropriate disciplinary sanctions.

Supervisors were trained on force investigations and performance evaluations during the 2014 Supervisor In-Service training.

## Chapter 4 **Other issues – Armory internal controls and procedures for conducting training reviews**

During the course of our review, we noted two additional areas that should be addressed by the Bureau. These are the controls over weapon check-outs at the Precincts, and the implementation of procedures for conducting Use of Force Review Board analyses by the Training Division.

### **Armory internal controls**

Ensuring that each officer checking out weapons from precinct armories received the appropriate training for those weapons is a critical component of officer and public safety.

All officers must complete handgun and shotgun qualifications and Taser training. Handgun and shotgun qualifying is very strict and must be successfully completed three times per year. Handguns and Tasers are not kept in precinct armories, because, in most cases, they are permanently assigned to individual officers.

The AR-15 assault rifle and the less lethal shotguns are specialty weapons for which additional training is needed. These weapons are always kept in precinct armories and are subject to Bureau and precinct procedures for check-out. It is the responsibility of precinct staff to maintain proper control over these weapons. There are three precincts: Central, North and East.

### **Range qualifying information to Training Division and to Precincts**

Officers must qualify at the shooting range three times per year to carry firearms. This program is overseen by a specialist at the shooting range who reports results to the Training Division. When officers do not qualify, a notice is sent to the Training Division, the precinct and to command staff.

### **Physical security**

All precincts keep their armories locked. Locking procedures, however, are not consistent. Two precincts grant access only to officers who are certified to carry the weapons. Central precinct allows access to all officers regardless of their specific qualifications. All precincts have additional secured lockers assigned to qualified officers for AR-15 rifles.

### **Check-out procedures**

Only North Precinct makes consistent use of a daily log. The log is a checklist of officers qualified for various weapons. A weapons inventory is conducted to match the list with checked out weapons each shift. The administrative supervisor updates the list three times per year from Training Division reports.

The other two precincts rely primarily on officers self-reporting weapon check-outs on the Daily Roster. Generally, it is assumed officers tell shift sergeants which weapons they are checking out. This approach has weaknesses. In one case, the shift sergeant told us that when an officer says they are checking out a weapon, he makes note of it and checks against a "qualifications" roster taped to his desk. However, he could not remember the last time his list was updated. In another case, two shift sergeants agreed that after reviewing the Daily Roster, one officer on patrol that day likely was carrying a less lethal weapon even though he hadn't notified them.

At one precinct, a sign on the armory door (see Figure 2) calls for weapons to be signed for on a log, per a precinct S.O.P. When we asked to see the log, there was none. Staff could not remember when the sign had been placed on the door or when they stopped using a log.

Because two of the precincts rely on officer self-reporting and do not conduct a daily inventory, and one precinct allows all sworn members access to the armory, there is the possibility that an officer could take out a weapon for which he is not qualified.



---

**Figure 2 Armory instructions to sign for weapons**



Source: Audit Services Division observation and photograph (8/19/2014)

### **Our Review of Check out records**

Based on a combination of Daily Rosters and log book check-outs, we reviewed the weapons checked out of armories for twelve randomly chosen dates and compared those to Training Division qualification records. We found that every officer who reported checking out less lethal weapons or AR-15 rifles on those dates were also listed as qualified on Training Division records. Our review, however, was limited due to inconsistent precinct records as discussed in the previous section.

### **Use of check out records to aid in emergency dispatch**

We were told by staff in the Training Division and in precincts about the importance of officers listing the special weapons they are carrying on each shift in the Computer Aided Dispatch (CAD) system. One precinct even requires this as part of their related SOP. This procedure is important so that emergency dispatchers know which resources are in the field at any given time, and so that officers with appropriate weapons and training can be called upon when needed. For example, if a situation requires multiple officers to respond with particular weapons, dispatchers can determine which officers and cars to dispatch to the call based on the tools or weapons they are carrying.

However, we found that officers are inconsistent in following this procedure. We attempted to verify officer certifications for less lethal shotguns and AR-15 rifles by cross-checking CAD records for various shifts with Training Division records. We found many instances where records showed officers on patrol with less lethal capabilities that did not match training records. Training Division staff researching this told us that in fact the CAD records refer to any one of two officers who might be in a car, so that a record might not be a definitive marker as to proper officer certifications.

We also noted that none of the less lethal designations in the CAD records showed the inventory number of the weapon supposedly being carried, as required by Bureau Directive. Further research by Training Division personnel showed that officers were likely not consistently updating CAD records with the required information that would ensure a dispatcher of the weapons being carried.

Bureau staff noted that in practice officers in need of special weapons or skills sets will broadcast a general call out for assistance. They do not necessarily rely on the CAD system for this information.

Due to inconsistencies in the use of both the paper rosters in the precincts and the CAD system, it is not possible for dispatchers or desk sergeants to have complete assurance as to the exact weapons carried by individual officers or in specific patrol cars on each shift.

**Implementation of new Division procedures for conducting Police Review Board reviews**

(Follow-up to recommendations made in prior report by the City Auditor)

In October 2012, the Portland City Auditor released an independent review of the testimony made in an arbitration case. This review was not an audit. The review looked for material discrepancies and omissions or possible untruthfulness related to the internal administrative and policy review in a 2010 officer-involved shooting. The City Auditor’s team examined relevant internal processes to evaluate their effectiveness as an accountability tool for management and the public.

One of the two major recommendations focused on the Training Division’s role in the process. The report found a lack of standard operating procedures for conducting training analyses. The team recommended developing a set of procedural guidelines. Subsequently, the Training Division adopted an SOP for conducting use of force reviews which included some of the recommendations. The following table shows specific report recommendations and which were adopted as part of the revised SOP.

**Figure 3 Training-related recommendations from 2012 City Auditor Review**

<b>Recommendation from Report</b>	<b>Police Bureau S.O.P. 7-1</b>
Develop a consistent process, including incident and training elements subject to analysis	YES
Develop procedures to identify the scope and analytical steps to be taken	YES
Consistently track and document changes to drafts	NO
Clarify rationale for any substantial changes	NO
Develop an objective quality assurance process that verifies facts and tests reasonableness of conclusions	NO
Clarify the staff level most appropriate for analysis and supervisory oversight	YES
Address if and when dissenting views are considered	NO
Include a timeline for completing the analysis	YES

Source: City Auditor’s Independent Review of Testimony in the Officer Frashour Arbitration. October 1, 2012

Training reviews in use of force cases are a critical part of the Bureau's efforts to learn from past experience. The Training Division provides expert guidance to police administrators and to the police review board in use-of-force cases. It is imperative that reviews be as complete and objective as possible. Independent review and close supervision are the essence of the Auditor's recommendations above. Therefore, we recommend that the Bureau adopt the remaining recommendations as part of SOP 7-1.

# Chapter 5 Recommendations

## General Training

1. **The Training database should be upgraded to include query capabilities for training that does not fit neatly into State and PPB mandated training or for classes not directly developed by the Training Division.**

Training Division staff indicated they are currently researching this idea.

2. **Improve the format of semiannual reports to include an assessment of how the training delivered during that period furthers Bureau policy, goals and objectives, not just how many classes were offered and who attended.**

The current format is of limited value for management purposes.

3. **The Bureau should be mindful of the need to consistently provide role-playing scenarios (particularly disengagement and confrontation management), especially for handling persons in mental crisis.**

Although significant time was spent on this during 2013 In-Service training, we did not find the same emphasis in 2014.

4. **Provide additional refresher training on officer responsibilities to procure medical care for a subject who is injured.**
5. **Provide training on not using profane language, demeaning labels and making in-appropriate comments.**

**Training on major policy issues**

- 6. Provide additional refresher training on less lethal weapon ammunition storage.**
- 7. Provide In-Service use-of-force training that is more focused on lessons to be learned from actual cases as well as Bureau policy.** Advanced and Basic Academies seem to be well focused on these topics.
- 8. Expand current efforts at training program evaluation to all important policy changes and Bureau initiatives that become part of training division responsibilities.**

Program evaluation should focus on the organizational outcomes related to Bureau goals and objectives, not just to program inputs. They should measure the degree to which training positively influences the performance of officers in the field and achieves policy objectives.

- 9. Institute the Training Division as a key player in the feedback loop when policy changes and effects are evaluated.**

Bureau processes for reviews of policy changes could be more effective if centralized into one unit, such as the Training Division, where they are developing more professional expertise in program evaluation.

**Other issues**

- 10. Improve internal procedures for checking out weapons from armories, and make them consistent across precincts.**
- 11. Develop a procedure, or improve supervisory oversight, to ensure that supervisors and dispatch operators are aware of the weapons each officer is carrying into the field for each shift.**
- 12. Make changes to the manner in which the Training Division conducts analyses for use-of-force reviews which incorporate the recommendations made in the October 2012 Auditors Report.**

(See Figure 3). These include providing objective quality assurance, and clarifying reasons for substantive changes to drafts.

## Chapter 6 **Audit objectives, scope and methodology**

Our primary objective was to assess the degree to which the Training Division within the Portland Police Bureau fulfills its responsibilities as the primary provider of training activities for the sworn officers of the Bureau and demonstrates the elements of a well-managed training organization. Although this audit is not intended to act as a status report for work on Department of Justice issues, we used the DOJ report as a framework for this evaluation. We used many of the training-related issues from the DOJ agreement to assess Training Division performance.

We collected and reviewed current literature on police training, and reviewed general training methods. We reviewed lessons plans and other course material from Basic and Advanced Academies and from annual In-Service training sessions.

To supplement these document reviews, we attended the 2014 In-Service training. That consisted of two auditors attending separate full day classroom sessions, several hours of scenario training, and a day of Enhanced Crisis Intervention Team training.

In order to test the accuracy of records we requested multiple employee training records and exception reports. We matched these against precinct armory check-out records to verify that officers had proper certifications for weapons they were carrying.

We also reviewed Bureau documents to determine the degree to which the Bureau in general, and the Training Division in particular, implement policy changes when major events occur necessitating changes in the way officers operate in the field.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



# RESPONSE TO THE AUDIT





## CITY OF PORTLAND, OREGON



### Bureau of Police

Charlie Hales, Mayor  
Lawrence P. O'Dea III, Chief of Police  
1111 S.W. 2nd Avenue • Portland, OR 97204 • Phone: 503-823-0000

Integrity • Compassion • Accountability • Respect • Excellence • Service

February 18, 2015

Mary Hull Caballero  
City Auditor  
1221 SW 4<sup>th</sup> Avenue, Room 140  
Portland, OR 97204

Dear Auditor Caballero:

I appreciate the opportunity to review and respond to the recent audit regarding the Portland Police Bureau's Training Division.

As the audit states, Police Officers operate in a complex, challenging and changing environment, where their training is essential to keeping themselves and the community safe. The Training Division is an integral part of the Police Bureau, responsible for the delivery of that training to sworn members. Providing consistent, thorough and superior training is critical in today's modern policing world.

The Training Division plays a major role in the DOJ agreement. They have already made significant changes in the way it develops, conducts and evaluates training. They have created timely curriculum to align with changes in the Bureau's directives, especially in the area of use of force and less lethal force. It has also developed and implemented training in regard to de-escalation tactics and enhanced crisis intervention. The Division will undergo additional review and development as DOJ recommendations are implemented and institutionalized.

Holistic and integrated training is finally now a reality with the recent opening of the Bureau's first Training Complex. With the addition of the Training Advisory Council, the Portland Police Bureau is poised to undertake these additional reforms to ensure it is one of the premier police training programs in the country.

I would like to thank the Auditor's Office and particularly, Principal Management Auditor, Ken Gavette, for his thorough and professional review of the Training Division. I am proud to say that we agree with or it is already our current practice with all of his recommendations. The Auditor's Office has highlighted the monumental responsibility and role this division plays in the Bureau in keeping our members safe and ensuring public safety for our community.

Sincerely,

LAWRENCE P. O'DEA, III  
Chief of Police

**Community Policing: Making the Difference Together**  
**An Equal Opportunity Employer**

City Information Line: 503-823-4000, TTY (for hearing and speech impaired): 503-823-6868 Website: [www.portlandpolice.com](http://www.portlandpolice.com)

# Training Division Audit Responses

1. **The Training database should be upgraded to include query capabilities for training that does not fit neatly into State and PPB mandated training or for classes not directly developed by the Training Division.**

**Agree.** The Training Division has drafted an RFP (Request for Proposals) and is currently working with the Bureau of Technology Services to solicit a new Learning Management System (LMS) with this functionality.

2. **Improve the format of semiannual reports to include an assessment of how the training delivered during that period furthers Bureau policy, goals, and objectives, not just how many classes were offered and who attended.**

**Agree in part.** Per the Department of Justice (DOJ) Justice Agreement, Section 82, the Training Division will provide a semi-annual report to the Assistant Chief of the Operations Branch. The purpose of this report is to keep the Chief's Office apprised on the delivery of training.

On an annual basis, the Training Division conducts a formal needs assessment and provides the Chief's Office with a briefing to keep them apprised of how training will further policy, goals and objectives.

3. **More consistently provide role-playing scenarios (particularly disengagement and confrontation management), especially for handling persons in mental crisis.**

**Agree. Current practice.** The Training Division is committed to providing training that is timely, relevant, and impactful to our members. One of the cornerstones of its program is scenario-based training where members are provided with the opportunity to practice new techniques and tactics in a safe environment.

In 2013, the Training Division provided members with 30 hours of In-Service training which allowed them to deliver several scenarios to officers. However, in 2014, annual In-Service was reduced to 20 hours for financial reasons. This reduction limited the Training Division's delivery to a smaller number of scenarios and they prioritized officer response to sudden attack (ambush) based on recent events where PPB members were ambushed. This prioritization was critical to providing timely instruction to Bureau members, but it did not signal a departure from the Division's commitment to provide ongoing instruction in disengagement and confrontation management.

**4. Provide additional refresher training on officer responsibilities to procure medical care for a subject who is injured.**

**Agree.** In 2013, The Training Division provided officers with ballistic shield refresher training during In-Service. This refresher included a discussion of the current directive.

The Training Division just released a Roll Call Video to provide members with an update on the tourniquet program, and the video includes a reference to the current policy.

Lastly, the 2015 In-Service will contain first-aid, CPR, and tourniquet training, which will also review the current policy.

**5. Provide Training on not using profane language, demeaning labels and making inappropriate comments.**

**Agree. Current Practice.** The Bureau provides this instruction through the following venues:

- In 2013, the Training Division provided members with instruction to avoid the use of demeaning labels and inappropriate comments in a classroom session.
- The Police Bureau has an existing directive on the use of profanity which has been read and reviewed by all members of PPB.
- On an ongoing basis, the Training Division will monitor member performance in the training environment and address any violations of the existing policy and/or the DOJ Settlement Agreement that pertain to this recommendation.

**6. Provide additional refresher training on less lethal weapon ammunition storage.**

**Agree. Current practice.** The Executive Order governing less lethal ammunition storage is covered in the less lethal certification course. All subsequent less lethal In-service training includes a review of the Executive Order.

**7. Provide In-Service use-of-force training that is more focused on lessons to be learned from actual cases as well as Bureau Policy.**

**Agree. Current practice.** As stated above, some of the scenario-based training included in 2014 In-Service was directly related to the ambush of PPB Officers.

Additionally, the Training Division is developing a case study of a PPB officer-involved shootings as recommended by the Performance Review Board. This content will be delivered during the 2015 In-Service and it will include a discussion of lessons learned.

8. **Expand current efforts at training program evaluation to all important policy changes and Bureau initiatives that become part of Training Division responsibilities.**

**Agree in part.** Formalized program evaluation has been used in the Training Division for a little over a year. Given the significant staff time required for complete program evaluation that includes measurement of organizational outcomes, the Training Division's efforts are confined to conducting program evaluation that meets the requirements of the DOJ Settlement Agreement. As existing staff gain capacity to include additional training initiatives, the Division will increase the scope of program evaluation. However, the scope suggested in this recommendation is not attainable with existing staffing levels.

9. **Institute the Training Division as a key player in the feedback loop when policy changes and effects are evaluated.**

**Agree. Current Practice.** Through the process of formalizing the Training Division's annual needs assessment, the Training Division has established a close relationship with the Chief's Office, the Office of Professional Standards, and others to ensure real time feedback on member performance. This feedback is incorporated into its needs assessment or addressed in a more timely manner when appropriate.

10. **Improve internal procedures for checking out weapons from armories, and make them consistent across precincts.**

**Agree.** This recommendation will be forwarded to the Operations Branch Commanders and they will be tasked with drafting a Bureau-wide policy to address this recommendation.

11. **Develop a procedure, or improve supervisory oversight, to ensure that supervisors and dispatch operators are aware of the weapons each officer is carrying into the field for each shift.**

**Agree.** This recommendation will be combined with recommendation #10 and addressed through a Bureau-wide policy.

12. **Make changes to the manner in which the Training Division conducts analyses for use-of-force reviews which incorporate the recommendations made in the October 2012 Auditor's Report.**

**Agree to review.** After the Auditor's 2012 Report, the Training Division drafted an internal SOP which addressed the majority of the recommendations from the report. The Training Division has conducted several reviews since this SOP was adopted, and believes the current process involves close supervision by the Training Manager and the Chief's Office to ensure a complete and objective review of the facts of the case.



**Audit Services Division  
Office of the City Auditor  
1221 SW 4th Avenue, Room 310  
Portland, Oregon 97204  
503-823-4005  
[www.portlandoregon.gov/auditor/auditservices](http://www.portlandoregon.gov/auditor/auditservices)**

*Police Training Division: Progress made, but evaluating impacts on officer performance must be improved*

Report #457, March 2015

Audit Team: Ken Gavette

Mary Hull Caballero, City Auditor  
Drummond Kahn, Director of Audit Services

**Other recent audit reports:**

*Portland Children's Levy: Funds benefit children, but goals and structure should be clarified (#468, February 2015)*

*City Budget Process: Timing, roles, and decision-making need improvement (#455, February 2015)*

*Portland Streetcar: City transit targets unmet, better performance management needed (#451B, December 2014)*

This report is intended to promote the best possible management of public resources. This and other audit reports produced by the Audit Services Division are available for viewing on the web at: [www.portlandoregon.gov/auditor/auditservices](http://www.portlandoregon.gov/auditor/auditservices). Printed copies can be obtained by contacting the Audit Services Division.

