

U.S. Department of Justice, Office of Community Oriented Policing Services
COPS FY 2010 Child Sexual Predator Program (CSPP)
City of Portland, Oregon Police Bureau
Program Narrative
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A. Problem Identification

Portland, Oregon, population 582,130, is the largest city in Oregon and is approximately equidistant between 11,700 foot high Mount Hood and the Pacific Ocean. It is located in the northwest corner of the state and is encompassed by Multnomah County, Oregon, which is the smallest county in the state based on square miles. However, like the City of Portland, Multnomah County is also the most populace county in the state at 714,567. Portland, Oregon accounts for approximately 81% of the county's population. Portland's 134 square miles accounts for almost 31% of the county's square mileage (435). Thus, 81% of the population lives in 31% of the land area. The Portland Police Bureau (Bureau) is 900 members strong and is by far the largest law enforcement agency in the state. It is responsible for all law enforcement needs within the city and handled 406,408 calls for service in 2009. These calls include the management and enforcement over the ever growing number of sex offenders living in Portland, currently standing at 3619 on June 15, 2010.

Portland, Oregon has more registered sex offenders compared to similarly sized cities. This is the main problem faced by the Bureau's Sex Offender Registration Detail (SORD). The statistics below do not reflect the additional high numbers of sex offenders who have moved into Portland and have not registered at all. Without those extra numbers reflected, Portland still has 620 registered sex offenders per 100,000 persons.

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The next closest similarly sized city is Las Vegas, Nevada at a mere 430 registered sex offenders per 100,000 people. The per capita numbers drop off precipitously when further compared with like populated cities. Other per capita rates are: Louisville, Kentucky at 175 per 100,000, Atlanta, Georgia at 180 per 100,000, Seattle, Washington at 160 per 100,000 and Washington, D.C. at 153 per 100,000.

Sex offenders flock to Portland, Oregon because the city is a melting pot of styles, cultures, lifestyles, and beliefs. Other cities support diversity but not to the extent that is found in Portland, therefore, people from all walks of life flock to Portland in order to find either a comfortable place with like-minded people or a place to hide among the tolerant-minded.

The extreme number of sex offenders in Portland have created legitimate safety concerns at the community level. Citizens are shocked when they learn their only quick public source to determine the locations of registered sex offenders are the Oregon State Police public sex offender web site and the Multnomah County Adult Community Justice/Sex Offender Supervision Unit (ACJ/SOSU). Together, these two sites display approximately 1,000 names and locations of offenders out of over 16,000 offenders in the state. For Portland, this equates to approximately 300 names out of the total number of 3,619 or 8%. Citizens want to know where every offender lives, his or her general modus operandi, whether they are on supervision, and which ones are considered more

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dangerous. Neither of these web sites provides detailed information for all of Portland's sex offenders. All the factors noted above come together to create many unique challenges for Portland's law enforcement officers. Of those problems, sex offender registration, tracking, enforcement, and community notification/awareness are key community safety concerns.

The Bureau's Child Abuse Team (CAT) reviewed 4,154 official reports of child abuse in 2009. At least 60% of these reports have a sexual component which equates to 2492 reports. On a bigger scale, the Department of Human Services/Child Protective Services handled 13,750 abuse reports of which approximately 8250 reports contained a sexual component. Not included in these numbers are 300 suspicious behavior reports describing luring type activities between an adult and child. The information in these reports does not yet rise to the level of criminal behavior and they oftentimes go uninvestigated. The Bureau refers to these as "Weirdo Reports" and they represent an area where Portland's Child Sexual Predators need special attention.

The State of Oregon is not yet Sex Offender Registration and Notification Act (SORNA) compliant. It should be understood that the Bureau is not the legal holder/responsible agency for the Oregon Sex Offender Registration Database. That responsibility falls to the Oregon State Police (OSP). They are entirely responsible for the database and facilitating SORNA compliance. The Bureau and SORD is a daily

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partner with OSP's Sex Offender Registration Unit (OSP/SORU). We share information daily and discuss issues affecting the database, SORNA compliance, and cases needing investigation/enforcement. SORD will be the cornerstone enforcement component as OSP becomes SORNA compliant.

In 2005, the Bureau started the SORD unit with one officer assigned to the Detective Division/Sexual Assault Unit. The officer's main objective at startup was to register convicted offenders, monitor registration compliance and enforce existing laws against non-compliant offenders.

Since 2005, the unit has grown 150%, with three officers currently assigned. The unit works daily with Multnomah County Adult Community Justice/Sex Offender Supervision Unit (ACJ/SOSU), the Multnomah County District Attorney, the Oregon State Police Sex Offender Registration Unit (OSP/SORU), Multnomah County Department of Human Services (Child Protective Services), Multnomah County Pre-trial Release Unit, several local city police departments, the U.S. Marshals Service (warrant unit), local/private homeless shelters, and local/private sex offender and substance abuse treatment providers. These partnerships are strong and are the main reason why we are currently handling so many cases with a minimum of staffing resources.

In addition to the original mandate, the unit now handles many reported sex

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crimes that previously went un-investigated. The unit attempts to handle as many of the “Weirdo Reports” as possible. A high number of these reports end up in criminal arrests/prosecutions against previously unidentified Child Sexual Predators (CSPs).

The Bureau has also provided the unit with a private office connected to the registration room, provided each SORD officer the highest grade computers, purchased office furniture and added security upgrades for the registration room. All these unit enhancements have been achieved due to the Bureau’s commitment to monitoring convicted sex offenders and enforcing both sex offender and sexual assault laws. The Bureau’s General Fund budget entirely supports the three officer unit.

In 2008, SORD applied for one of the Adam Walsh Act/SMART (AWA/SMART) Office Verification Grants. The grant was awarded and allowed SORD to train 29 Bureau officers in specialized sex offender enforcement. The officers were referred to as Detached SORD (D-SORD) members. They began working one day each month under the direction of the SORD Unit on an overtime basis using AWA/SMART grant monies. D-SORD officers conducted Address Verification Contacts (AVC’s) on all registered sex offenders in Portland. The goal of 100% verification was achieved and the D-SORD officers then went hunting for each and every offender deemed out of compliance. To date, all offenders have been located and appropriately adjudicated except for 36 out of 3262 in original AWA/ SMART Project. The AWA/SMART Office

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Grant funds have been fully expended at this writing and our final report is due in August 2010.

The Bureau learned through the AWA/SMART project that address verification work is the cornerstone to community safety as it relates to sex offenders. Without this type of hard-core field work, situations like the 18-year captive Jaycee Dugard in Antioch, California can and will occur. The Bureau is resolute in its efforts to ensure heinous situations do not occur within its borders. The Bureau has also initiated an Internal Pilot Program whereby yearly AVCs are now conducted by the D-SORD officers on as many registered sex offenders as staffing allows. The ultimate goal is that every offender gets a knock on the door. D-SORD officers perform the AVCs on one 10-hour shift per month at the Bureau's expense. This Pilot Program is coordinated by SORD which further demonstrates the Bureau's strong commitment to all sex offender related matters. The Pilot Program is in place and running in one of the three police precincts. There are plans to expand to all three precincts in the new fiscal year which begins July 1, 2010.

Based on current numbers, approximately 2280 offenders (63% of all Portland, Oregon registered sex offenders) are Child Sexual Predators (CSPs). Currently, there are no local, regional, or state resources to support a more intensive type of AVC program focused on Child Sexual Predators.

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The Bureau is responding to the valuable lessons learned because of the AWA/SMART Grant activities it conducted. We realize we need to fine tune our focus on Child Sexual Predators in an effort to collaboratively monitor, track and assist in their formal supervision and provide law enforcement investigation and intervention when appropriate.

The Bureau is proud to have been nominated to compete in this grant application process. We take our duties to community safety and sex offender enforcement seriously. We look forward to enhancing and maintaining strong partnerships with our partners at the United States Marshal's Service and the United States Attorney's Office. Additionally, we are anxious to begin a long and lasting partnership with the COPS Office as we all move toward SORNA compliance. The Portland Police Bureau is asking for \$489,648 in grant funds to accomplish these important community safety goals.

B. Program Goals & Objectives

Goal 1: Ensure victim and community safety through effective enforcement/management/supervision of Child Sexual Predators (CSPs) using a comprehensive investigative approach to include: obtaining background and modus operandi information from current/former supervision records, court documents, Child Protective Services (CPS) records, etc.

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Objective 1: Identify all CSPs living in Portland as Registered Sex Offenders. A CSP will be defined as an offender who has been convicted of any sexual offense against a person under 18 years of age.

Objective 2: Pull or prepare investigative jackets on CSPs and assign each CSP to a SORD or D-SORD member.

Objective 3: SORD or D-SORD member will obtain detailed background and modus operandi information on each assigned CSP. The information will be obtained from: ACJ/SOSU, CPS, Portland Police Data System, court records, etc.

Objective 4: SORD and D-SORD members will conduct three intensive AVCs on every CSP each year of the grant and will document the results on the appropriate reporting form.

Objective 5: All information from the AVC reports will be entered into a SORD unit database, already in place, to capture information from a previous AVC Program.

Goal 2: Enhance community awareness, safety and participation surrounding the issues of Child Sexual Predators.

Objective 1: SORD and D-SORD members will design and deploy a link from the Bureau's official website. The link will describe SORD's CSP Program efforts,

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provide links to websites that contain extensive sex offender registration information, and identify SORD and D-SORD officers to include providing phone numbers, emails, and the areas they normally patrol. The link will also have a “tip line” function so information and tips can be given directly to SORD.

Goal 3: Enhance children’s safety by investigating all “Weirdo Report” indicating possible inappropriate non-criminal behavior between and adult and a child.

Objective 1: Conduct immediate face-to-face follow-up with the adult in question, the child, and the child’s parents/guardians. (Immediate follow-up will be within two business days of receipt of the report).

Objective 2: Take appropriate police action on each “Weirdo Report” to include, arrests, notifications to Child Protective Services or other intervention services, assist/advise the victim, their family and offender on safety planning, advocacy programs, or any other social service which may be of assistance to victim and/or offender (i.e.: counseling, etc).

Goal 4: Enhance SORD and D-SORD officers’ knowledge base through sex offender specific training courses.

Objective 1: Each SORD member (three total) will participate in training two

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times a year for both grant years. One of those trainings will be the Kickoff training sponsored by the COPS office.

Objective 2: Two D-SORD members will be selected based on productivity to participate in two sex offender specific trainings each grant year.

C. Building Relationships & Solving Problems

The new program described will strengthen each and every partnership SORD currently engages in. Although we will be concentrating on CSPs living in Portland, our primary prosecuting body is county based. We receive and handle many requests for follow-up from our assigned District Attorney for cases outside our primary jurisdiction. This is due to our track record as a unit as well as the fact we are the only dedicated sex offender unit in the state.

SORD will continue to partner with ACJ/SOSU who will assist us by providing information and background on each offender as to how he/she committed the crime and the stated motivations behind the act (whether the CSP is currently on or discharged from supervision). Other types of information will further help us to evaluate and understand the offender. Items in this category include: risk assessment results, polygraph results, etc.

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OSP/SORU will also assist SORD in offender identification by helping us obtain out of state court records when needed. SORD will keep them apprised of all information uncovered in each investigation where it effects compliance with current state laws. SORD will also be available to OSP/SORU for any activities associated with SORNA compliance.

Multnomah County Department of Human Services (Child Protective Services) will become a critical partner in the endeavor. SORD will develop a relationship that mirrors that which we currently have with the ACJ/SOSU parole officers. The information we can share with each other will be immeasurably valuable for both sides of the table.

Multnomah County Pre-trial Release Unit will continue to help us identify Child Sexual Predators (CSPs) who should be held pending trial. SORD will continue to help them hold CSP offenders in custody by providing quality information on past offenses and current behaviors which will increase community safety.

Several local city police departments are located within the county but do not have a dedicated sex offender unit. SORD will reach out to offer training and guidance about Child Sexual Predators. We will encourage all local law enforcement partner agencies to include registration information in our database for immediate access to all

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area patrol units. These Oregon cities include: Gresham, Troutdale, Fairview, Wood Village and unincorporated Multnomah County.

SORD will strengthen our partnership with the U.S. Marshals Service. Specifically, we will seek to notify them on every offender we determine has left the state and not re-registered.

SORD partners with many local/private homeless shelters, and local/private sex offender and substance abuse treatment providers. We share information, provide on-site registration service, arrest or register out of compliance offenders in the programs and help each entity to craft their own internal policies regarding CSPs in their programs. SORD will seek to increase the number of programs it currently has official partnerships with.

SORD will bring appropriate fail to register cases to the attention of the U.S. Attorney's Office during the grant period. The cases will involve inter-state relocation of CSPs. We will seek to build a strong alliance as we travel toward SORNA compliance.

Collaborative problem solving will be the cornerstone to this project. The main grant funded activity (intensive AVCs on CSPs) will only be successful if the assigned SORD or D-SORD officer conducts complete research on their assigned CSPs and then conducts the intensive AVCs three times a year. SORD and D-SORD will need to rely

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on our partnerships as we strive toward this goal, which is substantially SORNA compliant.

As for organizational transformation, the Bureau has already shown its dedication to tackling sex offender issues with vigor. The Bureau's procedures went from zero enforcement in 2005 to the only dedicated sex offender unit statewide in three short years. In spite of current economic downturns, the Bureau has increased its SORD unit numbers 150%, committed specific patrol resources to verifying all offender addresses on a routine basis at the department's expense, and is endeavoring to change the mentality of the patrol officers that sex offender enforcement is the job of SORD only by implementing the Pilot Project for AVCs. The Bureau recognizes the important role SORD holds for the Bureau, the community, the region and the state. The Bureau has no plans to de-centralize that function. However, a form of de-specializing is found in having more officers become involved in D-SORD and ensuring as many officers as possible receive training from SORD about sex offender issues.

D. Program Design & Implementation

The program will be called the SORD/Child Sexual Predator Program, or SORD/CSPP and the identified offenders will be known as Child Sexual Predators (CSPs). The three permanent SORD officers will continue to coordinate and manage

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the flow of the work to be described. The SORC (Sex Offender Registration Coordinator) will remain the coordinator and grant manager. The other unit officers will be referred to as SORO (Sex Offender Registration Officers) and will assist with all unit and program issues. The four goals described in the Project Goals and Objectives section will be conducted by both SORD and D-SORD members on an overtime basis using grant funds. This will allow the other critical work SORD members conduct on a daily basis to continue.

SORD and D-SORD members will begin completing activities to reach Goal #1 within the first two months. SORD will identify current Registered Sex Offenders (RSOs) whose underlying sexual offense was committed against a person under 18 years of age. This number is projected to be approximately 2280 Child Sexual Predators. Each CSP's investigative file will be pulled from existing files or created. The CSP's file will be assigned to a specific SORD or D-SORD officer and the officer will be required to conduct intensive criminal background checks, obtain psychological and risk assessment data from project partners. These activities can be achieved by the beginning of the third month.

Over the two year grant period three intensive AVCs will be conducted each year on all identified Child Sexual Predators. The SORD or D-SORD officer will also be required to serve a notification form on each CSP advising them of the potential changes

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to sex offender registration laws that SORNA will affect. The form, known as the AWA Form, will be a revised version from the one originally created for use in the AWA/SMART Office Grant Project. The form will become part of the official record and will be accessible for any future prosecutions. The form will bear the markings required of all forms created for use in a COPS Grant Program. This intensive field activity will begin in month three and continue the entire grant period.

SORD members will ensure that all data from program reports are entered into the already existing SORD database. Overtime may be needed for this activity due to the large numbers of reports that will be generated (6840 reports/year x 2 years = 13,680 minimum projected reports). Bureau officers or civilians will conduct this work. This will begin in month three as the AVCs begin and continue throughout the grant period.

The activities described above will capture the vast majority of Portland's registered sex offenders who would likely be classified as Tier II and III offenders under SORNA guidelines. CSPs would not be required under current Oregon law to complete a new registration during the AVC, however if new information is uncovered there is no law prohibiting such action. Although Oregon is not SORNA compliant, the SORC has had detailed discussions with the manager of the OSP/SORU and the state is making progress toward that end. There is nothing codified in Oregon Revised Statutes which prohibits SORD from conducting legitimate and intensive verification activities. In fact,

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the original SORD AVC Program conducted with the Adam Walsh Act/SMART Office funds can not be categorized as anything other than an absolute and huge success whether it is measured internally by the department or externally by Portlanders. Thus, by conducting this new CSP focused AVC program, SORD will be substantially supporting SORNA compliance. SORD will be far ahead of the implementation curve and will be a strong resource for the rest of the state. By using the AWA Form, the offenders identified as CSPs will be fully advised of the impending SORNA changes. It will be much harder for these offenders to effectively argue, after SORNA implementation, that they were ignorant of the legal changes. This will make prosecutions at the state or federal levels more effective and successful.

SORD and D-SORD officers will design and deploy a SORD/CSP Project web link on the official Bureau website within the first six months of the grant. The link will give an overview of the SORD/CSP Project, links to SORD and D-SORD member names, phone numbers and email addresses, as well as a description of the area where each D-SORD officer generally patrols on their regular shift. The site will also link the community with other websites they may wish to surf in order to promote community safety in their own neighborhood (specifically websites that provide full information on all 16,000+ registered sex offenders in Oregon). The link will support a "tip line." Citizens will be able to report any criminal or suspicious behavior they witness. The

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citizens will have the option of anonymity. Partner agencies will be listed on the web site including links to their home pages. The SORD link will remain for the full grant period and be maintained as a permanent unit feature.

Beginning in month two and continuing for the entire length of the grant SORD and D-SORD members will provide immediate follow-up investigation to all "Weirdo Reports" received by the department. Immediate follow-up shall be defined as activity occurring within two business days of receipt of the report at the SORD Office. The report will be assigned, appropriate background work will be accomplished and the assigned officer will make face-to-face contact with the adult in question, the child, and the child's parents/guardian. All appropriate police action will be taken and documented on police reports. The officer will also ensure that all community resources that may be useful to the potential victim, victim's family and offender are researched and presented. When appropriate, an arrest will be made whether it be for crimes of a sexual nature or not.

Grant monies will be used to send the three SORD and two D-SORD members to two training classes per year directly related to sex offender enforcement/supervision/tracking (to include the required grantee technical assistance/kickoff).

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All the activities described herein clearly encompass the three tenets of community policing: community partnerships, problem solving, and organizational transformation. SORD and D-SORD Officers will be using a multitude of agencies both public and private to develop a deep understanding of each CSP which will enable SORD to make effective and responsible decisions regarding the level and type of enforcement and monitoring each CSP requires. This approach to the CSP involves a comprehensive problem solving technique designed to reduce the likelihood the CSP will re-offend and increase the likelihood the CSP will be detected if they re-offend.

E. Evaluation Plan

The following objectives will be quantified:

- ◆ AVCs conducted per CSP.
 - ◆ Number of CSPs in project.
 - ◆ Number of AVC reports entered into SORD database.
 - ◆ Existence of the SORD/CSP link from the official Bureau website with all noted items/features described.
 - ◆ Number of “Weirdo Reports” received by the Bureau.
 - ◆ Number of “Weirdo Reports” that receive follow-up within two business days.
 - ◆ Number of arrests.
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- ◆ Number of sexually related arrests.
- ◆ Number of referrals to partner agencies.
- ◆ Number of AWA form distributed.

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A. Sworn Officer Positions:

N/A

B. Civilian/Non Sworn Personnel

N/A

C. Equipment Technology

N/A

D. Supplies

The Bureau is requesting \$24,584 in supply costs which will cover the following items:

Two Tough Books with DVD Multi-pack, full internet capabilities for access to internet sex offender databases, and all software required to run the full complement of Portland Police Bureau (Bureau) databases as well as access the Bureau's mainframe. These computers are needed for the SORD unit officers to conduct the intensive AVCs. Specifically, all computer checks will be updated prior to the AVC as well as a current check of probation/parole conditions and the current state of the CSP's supervision status. The computers are estimated at \$4,792 each for a total of \$9584.

Forty mini digital cameras will be issued to 33 SORD and D-SORD officers. The cameras will be used for routine field work with the CSPs to document supervision violations (i.e. alcohol in the home, etc), take offender photos for the sex offender registry, document other aspects of investigations such as victim's injuries, locations of cars, location and conditions at crime scenes. The other seven cameras will be intermittently loaned to partner agencies as needed to assist them in documenting the same issues. The estimated cost of 40 cameras at \$240 each is 9,600.

Two high resolution digital cameras will be purchased for the permanently assigned SORD officers. One camera will replace the 10 year old camera now used in the registration room. It will be connected to the registration computer and will allow SORD officers to take offender photos during registration that are more detailed and clear. These photos will be head shots as well as photos of all identifying features such as

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tattoos and distinctive scars or birthmarks. The second camera will be used for the same function while conducting field registrations. It will also be used to take photos of offenders, victims, and conditions at all Measure 11 Crimes which carry mandatory sentencing conditions within the State of Oregon. The cameras are estimated to cost a maximum of \$1,065 for a total of \$2,130.

Portfolio cases will be purchased for all SORD and D-SORD officers to carry and store CSP folders. Many of the existing portfolios require replacement due to continual usage and transmission through Bureau interdepartmental mail since 2008. We are requesting 50 at this time to cover current replacement needs as well as future needs over the two year grant period. Costs are estimated to be \$15 for each portfolio for 80 portfolios equals \$1,200

Heavy duty file folders need to be purchased in order to create new CSP files as well as replace those folders which exist but need replacing due to wear and tear. We are estimating needing to replace half the currently existing CSP folders. We anticipate ordering 50 cases (25 in each case) at \$22 per case for a total of \$1,100.

Scheduling calendars will be ordered for each SORD and D-SORD officers. The calendars will cover a two year period and will be used to help all officers keep track of scheduled CSP AVCs, training assignments, and other activities associated with the grant.

The BUREAU will purchase paper (hole punched), NCR carbon type paper, printing expenses for AWA Forms, etc., for the duration of the grant period. The requested amount of \$790.00 is in line with the needs determined during the last intensive AVC program.

E. Travel/Training

The Bureau is requesting to fund a total of four training trips for five officers over the two year grant period. The estimates include airfare, hotel, per-diem, and registration costs (if applicable). In the first year the Bureau will send five SORD/D-SORD officers to the COPS/CSPP Kickoff event which has not yet been set. The training during the remainder of the grant period will be specifically related to sex offender enforcement and supervision. Since the specific training can not be specified at this writing, the Bureau's

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grant fund coordinator will obtain specific approval for each training from the Federal grant manager prior to each training. The Bureau is estimating \$1200 per trip, per officer for a total expense of \$24,000 over the two year grant period.

F. Contracts/Consultants

N/A

G. Other costs

The Bureau is requesting grant monies for overtime to conduct three intensive AVCs on 2280 CSPs per year. The AVCs will be conducted by each officer during 14/eight hour overtime shifts a year (112 hours/1 year and 224 hours/2 years). Officer overtime is paid at a rate of \$52/hr which equates to \$11,648 per two years per officer. Thirty-three officers will participate in the program which equates to \$384,384 for the two year total. (33 officers X 224 hours X \$52 = \$384,384)

The Bureau is requesting overtime to perform the vast administrative work of adding all the investigative results of the AVCs into the existing SORD database. There will be over 13,680 reports generated from this program in a two year period. It is imperative to capture the data for investigative and reporting reasons. We are requesting two hours a week for 50 weeks (200 hours) each grant year. An officer's overtime rate is \$52 /hr. This equates to a cost of \$20,800. (400 hours X \$52 = \$20,800)

The Bureau is requesting grant monies for overtime to conduct full investigations on all "Weirdo Reports" made in the city over a two year period. We estimate there will be 300 reports a year and are asking one hour to investigate each one. At \$52/hr x 600 hours that equates to \$31,200.00

The Bureau is requesting grant monies to assist in the creation and deployment of an internet link from the Bureau's Official Website to the SORD/Child Sexual Predator Program. We estimate two hours a week for 30 weeks (60 Hours) in the first year will be needed for creation and deployment. We further estimate 1 hr a week for 30 weeks (30 hours) will be needed the second year for maintenance and updates. That is a total of 90 hours and at \$52 an hour the total cost comes to \$4,680.

Justification for overtime described above:

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The number of sex offenders within Portland's boundaries is six to seven times that found in most cities of comparable size. This creates a unique problem for the Bureau and its three officer Sex Offender Registration detail. Three officers handling 2280 Child Sexual Predators equates to a caseload of 760 CSPs per officer. Using 30 additional officers brings the caseload down to 69 CSPs per officer. Although still high, this number is manageable within a structured and highly organized program such as the one described herein. The AVC system was devised and used to verify and track all registered sex offenders during the AWA/SMART grant. All project goals were met and most were exceeded. The AVC system will work more efficiently and effectively as we fine tune our approaches and our targeted offenders to CSPs only.

If a "backfill" approach was taken, the Bureau would have to hire and train 30 more officers to achieve the same results. While this may seem attractive, the Bureau can not commit to supporting a 33 person SORD detail. Besides fiscal issues, housing and outfitting a unit that large is cost prohibitive.