

Table 1. ALL PROPOSED CHANGES SINCE TRANSMITTAL - Proposed Amendment 7 (T) = Technical

(T)	No.	Page:Line	Section	Summary of proposed language
INTRO SECTIONS				
	1	1:5	Intro	Adds “community” to title of ordinance.
	2	1:10 to 5:5	Intro	Adds Whereas recitals and findings to support goals of accountability.
	3	2:1 to 3:5	Intro	Adds Whereas recitals to support geographic representation.
	4	8:12	Chapter 3.29	Adds “Community” to title of chapter.
	5	8:13	3.29.005	Changes section title from “civilian oversight” to “police oversight”
	6	8:14 to 9:20	3.29.005	Further refines Purpose statements to emphasize unique roles of each oversight entity in supporting oversight.
	7	9:8	3.29.005	OIG is named OIG “for Public Safety.”
	8	9:21 to 10:7	3.29.005	Adds purpose statement emphasizing role of Chief of Police in supporting oversight.
	9	10:7	3.29.005	Chapter 3.29 does not limit Chief’s duties under the City Charter.
T	10	10:12; 11:9	3.29.007	Adds definitions for Chief and OIG for Public Safety, populated throughout.
	11	10:14 to 11:23; 13:3 to 13:15	3.29.007	Definitions of OPA finding-related categories reference the OPA Manual, or SPD policy for Type III force. Aspects of management action, supervisor action, and training referral definitions that weren’t part of the manual definitions are moved below.
	12	12:1 to 12:9	3.29.009.A.	Adds a new section that consolidates and moves non-interference language to front of ordinance.
	13	12:10 to 12:15	3.29.009.B.	Consolidates and moves duty to advise City and each other on Chapter 3.29 and systemic improvements to front of ordinance.
	14	12:16 to 12:20	3.29.009.C.	Consolidates and moves quarterly collaborative conversations on fulfilling the purpose of Chapter 3.29 to the front of ordinance.
	15	12:16	3.29.009.C.	Adds SPD to quarterly collaborative conversations.
	16	12:19	3.29.009.C.	Between “review” and “the extent to which the purposes...are being met” deletes review of “the implementation status of recommendations made about the police accountability system and”
OPA				
T	17	13:22	3.29.010	Adds “Functions and authority” back to the OPA establishment section title to reflect reorganization of this section.
T	18	14:1	3.29.010	Removes “office of the City” language to clarify that OPA does not sit outside of SPD.
	19	14:3 to 14:4	3.29.010	Deletes purpose language and integrates with 3.29.005 purpose section.

For GESNCA 4-26-17 Proposed Amendment 7 Table

(T)	No.	Page:Line	Section	Summary of proposed language
	20	14:10 to 14:14	3.29.010	Deletes "Work is intended to instill" goal-type language; concepts informed the rewrite of the Purpose section.
	21	14:19 to 18:2	3.29.010	OPA authorities and duties are reorganized to do the following: <ul style="list-style-type: none"> • Moves "intent" language into one bullet ("OPA complaint processes shall be fair, impartial...") • Moves core functions of the office into the "Functions and Authority" section • Groups duties related to enhancing SPD culture of accountability • Groups duties related to being responsive to community needs and concerns • Other specific changes detailed separately
	22	14:19	3.29.010	OPA processes – includes "initiate" misconduct allegations
	23	14:21 and 15:9	3.29.010	OPA complaint processes – deletes "transparent" from list that includes fair, impartial, consistent, thorough, timely, understandable, and accessible.
T	24	15:12	3.29.010	OPA authority to address complaints - deletes authority to "receive" due to redundancy with earlier provision.
	25	15:15	3.29.010	Adds that management action findings can be made for sustained or not sustained complaints (moved from definitions section).
	26	16:4 to 16:6	3.29.010	Deletes OPA requirement to employ professional civilian staff to work with supervisors.
	27	16:11	3.29.010	Replaces phrase that OPA shall provide input to OIG on systemic problems with "OPA shall identify systemic problems" to align with duties section language as opposed to identifying a reporting structure.
	28	17:2	3.29.010	Clarifies that OPA can help ensure training is incorporated, as opposed to ensuring it.
	29	17:16 to 17:19	3.29.010.I.2	Makes OPA use of complaint navigators mandatory; changes "complainant" navigators to "complaint" navigators.
T	30	18:1	3.29.010	Clarifies that the technical assistance that is rendered to CPC is on "OPA matters"
	31	18:10	3.29.015	Adds "complaint handling" in addition to investigations as a more complete picture of OPA duties that necessitate access to data.
T	32	18:8	3.29.015	Deletes "deemed to be" as unnecessary ambiguous language.
	33	18:18 to 18:23	3.29.015	Deletes language as part of consolidation of non-interference.
	34	20:8	3.29.020.A.	Strengthens "duties" by restating as "authority and responsibility"
	35	20:8 to 23:14	3.29.020.A.	Reorders OPA Director duties, including moving some to Functions and Authority section 3.29.010
	36	21:10	3.29.020.A.7	Adds "direct OPA investigative processes" to the list of duties as a more complete picture .
	37	21:16 to 21:17	3.29.020.A.8	Moves investigation plan requirement to investigation plan section.
	38	21:23	3.29.020.A.10	Deletes reporting to public for disciplinary processes, as part of reporting streamlining.

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	39	22:3 to 22:4	3.29.020.A.11	Deletes reporting to public for complaint investigation trends, as part of reporting streamlining.
	40	22:1	3.29.020.A.11	Adds CPC to those working to reduce misconduct through identification of patterns or trends in complaints.
	41	12:12 to 12:14	3.29.020.A.15	Deletes references to understandable material (replaced in OPA Reporting section with culturally relevant material)
	42	22:16	3.29.020.A.12	Adds “culturally and linguistically appropriate” to consultation with CPC for understandable material
	43	23:5 to 23:9	3.29.020.A.18,19	Deletes language as part of consolidation of collaborative conversations and duty to advise.
T	44	13:10 to 13:11	3.29.020.A.21.	Reorders list.
	45	23:16 to 23:17	3.29.020.B.	Adds that OPA Director shall not have been formerly employed by SPD.
T	46	24:16 to 24:17	3.29.020.C.1	Corrects and clarifies appointment wording.
	47	24:19 to 24:20	3.29.020.C.1	Search committee shall be at least 25% CPC.
T	48	25:9 to 25:10	3.29.020.C.2	Deletes unnecessary sentence about first OPA Director term.
	49	25:19 to 25:21	3.29.020.C.3	Replaces 3-member select committee with GESCNA.
T	50	25:22	3.29.020.C.3	Corrects from “does not confirm” to “reject.”
T	51	26:12	3.29.020.C.4	Clarifies and reiterates that Council confirmation of OPA director requires 5 votes.
	52	26:19 to 27:12	3.29.020.C.5	Adds that GESCNA Chair and Chief receive written notice of the intent to remove an OPA Director; the hearing takes place in GESCNA; clarifies that a majority of the full Council (i.e., five Council votes) is required for removal.
T	53	27:8 to 27:13	3.29.020.C.5	Reorganizes section; clarifies that a vote to not approve removal is a vote to reject removal.
T	54	28:12 to 28:14	3.29.025.C.	OPA authority for admin investigations is moved from duties section to investigations section.
T	55	29:7 to 29:8	3.29.025.F.	OPA investigation plan requirement is moved from duties section to investigations section.
T	56	30:3 to 30:6	3.29.025.I.	OPA priorities for investigation is moved from duties section to investigations section.
	57	33:16 to 33:17	3.29.027.A.	Removes requirement that IG be present for meeting on disagreement of Chief with OPA Director recommendations on findings.
T	58	33:18 to 33:19	3.29.027.B.	Grammatical restructuring to get rid of (s) parentheses
	59	34:4 to 34:21	3.29.027.B.,C.	Adds that written notice is given to, among others, Council President, GESCNA Chair, and CPC Executive Director, when Chief decides not to follow OPA recommendations or when OPA Director explains why investigation time limits were exceeded.
	60	36:11 to 36:12	3.29.028.D.	Adds that Civilian OPA staff cannot be former SPD officers.
T	61	37:5	3.29.030.A.	Deletes unnecessary language on some recipients of reporting.
	62	21:10 to 21:15	3.29.030.A.	Changes understandable reports to culturally, linguistically, physically accessible reports.

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(T)	No.	Page:Line	Section	Summary of proposed language
	63	37:8	3.29.030.A.	Clarifies that language around understandable reports means the annual reports.
	64	37:14	3.29.030.B.	Specifies that OPA community outreach on system access shall be done with assistance of CPC.
	65	37:21	3.29.030.C.	Adds that monthly compilations of OPA completed investigations must be posted on web site.
T	66	38:5	3.29.030.D.	Clarifies by replacing “its” with “these”
	67	38:6 to 38:9	3.29.030.E.	Deletes OPA quarterly report on OPA recommendations as part of reports streamlining.
T	68	38:10 to 38:11	3.29.030.E.	Moves requirement to release information promptly from duties to reporting section.
	69	39:3 to 40:17	3.29.030.H.,I.	Modifies scope of annual report to include the extent to which Chapter 3.29 duties have been met and the reason for any recommendations not implemented; reframes geographic distribution as being precinct and sector-based; clarifies that seniority refers to length of service; eliminates reference to modifying annual report in consultation with CPC for better public understanding.
	70	41:18 to 42:4	3.29.035	Deletes language as part of consolidation of collaborative conversations and duty to advise.
OIG				
	71	43:4 and throughout	3.29.100.A. and various	Renames OIG as OIG for Public Safety
	72	43:7	3.29.100	OIG establishment section renamed to include “Functions and authority”
	73	43:7 to 46:8	3.29.100	IG duties are reorganized to put core functions under “functions and authority” section 3.29.100. <ul style="list-style-type: none"> Consolidates intent language in 3.29.100.D Groups duties related to enhancing SPD culture of accountability Groups duties related to being responsive to community needs and concerns Other specific changes detailed separately
	74	43:9 to 43:13	3.29.100.A.	Deletes purpose statement and combines with 3.29.005 purpose section.
	75	43:18 to 43:23	3.29.100.C.	Deletes “work is intended to instill” language; ; concepts informed the rewrite of the Purpose section.
	76	43:23 to 44:2	3.29.100.C.	Requires a civilian deputy IG position.
	77	44:2 to 44:7	3.29.100.C.	Adds that Deputy IG can act on behalf of the IG. Requires outside background check for this position and any others performing OPA auditor or police intelligence auditor functions.
T	78	44:8	3.29.100.D.	Deletes unnecessary “third party” language.
	79	44:18	3.29.100.D.	Deletes reference to OPA reporting on effectiveness of complaint system as part of report streamlining.
	80	45:2 to 45:4	3.29.100.E.	Deletes consent decree language and moves concept to the 3.29.005 purpose section.

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T	81	45:6	3.29.100.F.	Clarifies “activities” as “management, operations, and practices”
	82	46:3	3.29.100.J.4	Adds reference to other technologies in addition to a hotline, and the hotline is for any matters relevant to Chapter 3.29, not just OIG matters.
	83	47:11 to 47:16	3.29.105.A.	Deletes language as part of consolidation of non-interference language.
	84	51:3	3.29.110.A.	Strengthens “duties” by restating as “authority and responsibility”
	85	51:3 to 57:21	3.29.110	IG duties: <ul style="list-style-type: none"> • reorders duties • moves some duties to Functions and Authority section 3.29.100 • moves examples of audits to reporting section.
	86	51:5	3.29.110.A.1	Adds IG duty to manage all functions and responsibilities of OIG.
	87	51:8 to 51:9	3.29.110.A.2	Adds that civilian OIG staff cannot be former SPD officers.
T			3.29.110.A.3	Grammatical clarification (audits and reviews not be limited to)
	88	52:1 to 52:17	3.29.110.A.6	OIG annual work plan can receive input from OPA Director and CPC, but terms are less prescriptive on CPC meeting and involvement; Council may direct addition of items to the OIG’s work plan.
	89	52:17	3.29.110.A.6	Clarifies that when OIG considers budget constraints, it is in regards to “adding areas” to its workplan as opposed to “modifying” the workplan.
	90	55:7 to 55:9	3.29.110.A.8	Adds that IG monitors implementation of recommendations by IG, OPA Director, and CPC.
	91	55:20 to 55:21	3.29.110.A.9	Deletes OIG reporting to public on concerns with disciplinary processes as part of report streamlining.
	92	56:15 to 56:17	3.29.90110.A.14	Deletes periodic OIG reports on sworn civilian mix as part of report streamlining (it is still in annual report list).
	93	56:18 to 56:22	3.29.110.A.15	Deletes language as part of consolidation of duty to advise.
T	94	58:2 to 58:13	3.29.111	Clarifies language around auditing of random samples, as opposed to random audits of samples.
	95	62:5 to 62:6	3.29.113	Adds that IG shall not have been formerly employed by SPD.
T	96	63:22 to 65:15	3.29.114	Corrects and clarifies appointment wording; changes “commence” date to “end” date to make off-set years work with OPA Director term; corrects “does not confirm” to “reject” and corrects section citation.
	97	64:1 to 65:7	3.29.114	Changes Council select committee role in OIG appointment to GESNCA committee.
	98	64:4	3.29.114.A.	Search committee shall be at least 25% CPC.
	99	66:4 to 66:8	3.29.114.E.2	Makes language consistent with OPA Director language for GESNCA receiving IG’s request for a hearing to contest removal, with a copy to the Chief, and holding the hearing in GESNCA.

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(T)	No.	Page:Line	Section	Summary of proposed language
	100	66:18	3.29.114.E.4	The two-thirds vote to remove the IG must be six of the nine members.
T	101	67:4	3.29.115	Changes section title from Reporting to Audits, Reviews and Reporting
T	102	67:9 to 69:5	3.29.115.A.	Moves examples of audits from IG duties to 3.29.115.
	103	69:7	3.29.115.B.	Clarifies that OIG conducting community outreach to inform the public is done with the assistance of CPC (not intended to require CPC be sole avenue for OIG outreach).
	104	69:9 to 69:12	3.29.115.C.	Quarterly OIG reports on recommendations shall also go to OPA; clarifies that this includes recommendations for both SPD and OPA.
	105	69:9 to 69:12	3.29.115.B.	Deletes quarterly OIG reports on recommendations as part of report streamlining.
	106	69:13 to 69:16	3.29.115.C.	OIG, in partnership with CPC, shall periodically report on how SPD is meeting diverse workforce needs.
	107	44:16 to 44:18	3.29.115.A.	IG reports must be culturally, linguistically, and physically accessible, with CPC's assistance.
	108	69:19 to 69:21	3.29.115.D.	Adds that OIG annual report must be readily understandable (mirrors OPA annual report language).
	109	70:1 to 72:8	3.29.115.D., E.	Modifies scope of annual report to include the extent to which Chapter 3.29 duties have been met and any reasons recommendations were not implemented; adds results of any other intake information besides the hotline; eliminates inclusion of information requested by CPC to help make report useful.
T	110	70:1 to 70:21	3.29.115.D., E.	Make tenses of annual report requirements consistent; reorders the recommendations requirement; renames SPD complaint-handling as OPA complaint-handling.
T	111	70:13 to 70:17	3.29.115.D.9	OIG annual report recommendations for changes in sworn-civilian mix and in other areas is split into two items.
	112	70:16	3.29.115.D.9	For OIG annual report analysis of prior recommendations, detailed description of those recommendations (on policies, practices, etc.) is deleted for streamlining.
	113	72:15 to 72:16	3.29.115.F.	Clarifies that draft reports are provided to agencies, including CPC, if they are the subject of the report – i.e., clarifying the meaning of “as appropriate”
	114	72:15	3.29.115.F.	Draft reports to CPC are delivered to the CPC Executive director.
T	115	72:15	3.29.115.F.	Department is replaced with Directors for grammatical consistency.
	116	72:22 to 72:23	3.29.115.F.	Deletes requirement to make reports understandable (replaced with culturally, linguistically appropriate language in subsection A.).
	117	73:8 to 73:18	3.29.120	Deletes language as part of consolidation of collaborative conversations and duty to advise.
CPC				

For GESNCA 4-26-17 Proposed Amendment 7 Table

(T)	No.	Page:Line	Section	Summary of proposed language
	118	74:23 to 76:20	3.29.200	CPC establishment section is renamed to include Functions and Authority. <ul style="list-style-type: none"> • Some functions of the CPC are moved up into this section. • Duties related to community concerns are grouped • Other changes detailed below.
	119	75:1 to 75:9	3.29.200	Deletes CPC purpose statement and combines with 3.29.005 purpose section.
T	120	75:15 to 75:19	3.29.200.B.	CPC consent decree duties paragraphs are combined.
	121	75:22	3.29.200.C.	Adds "police services" to the areas where CPC provides input.
	122	76:11	3.29.200.D	Adds SPD as body CPC helps with community feedback.
	123	78:4 to 79:14	3.29.206	CPC Executive Director is shortened to "Executive Director" by definition
	124	78:9 to 79:11	3.29.206	Makes CPC Executive Director appointment similar to Seattle Ethics & Elections Commission, including appointment by the Commission, for six-year term, and removal (only) for cause by a majority vote of its membership.
	125	78:11	3.29.206	CPC Executive Director cannot have been a former SPD employee.
	126	79:12 to 79:14	3.29.206	Adds that CPC shall annually evaluate the performance of the Executive Director.
	127	79:15	3.29.206	Strengthens "duties" by restating as "authority and responsibility"
	128	80:21 to 80:22	3.29.210	Adds that CPC staff cannot be former SPD officers.
	129	81:1 to 81:8	3.29.210	Deletes language as part of consolidation of non-interference.
	130	82:4	3.29.215	Strengthens "duties" by restating as "authority and responsibility"
	131	82:4 to 86:20	3.29.215	Duties are reorganized, with some moved into the Functions and Authority section 3.29.200
	132	83:5 to 83:8	3.29.215	Deletes reference to quarterly meeting with OPA and OIG as part of consolidation of collaborative conversations.
	133	83:11	3.29.215.A.1	Clarifies CPC appointment of members of OPA and IG search committees could include more than just a co-chair.
	134	83:16 to 83:20	3.29.215	Deletes language as part of consolidation of duty to advise.
	135	84:4 to 84:8	3.29.215.A.2	Adds CPC duty to assign Commissioners for geographic representation of each district.
	136	84:9 to 85:2	3.29.215.A.8	Clarifies that CPC annual meeting presents annual report highlights as opposed to a separate report as part of report streamlining.
	137	85:14 to 85:16	3.29.215.A.5	Deletes duty to monitor and report on recommendations of each oversight entity.
	138	85:14 to 85:16	3.29.215.A.5	Adds that CPC monitors implementation of recommendations by IG, OPA Director, and CPC.
	139	85:20	3.29.215.A.7	Clarifies that CPC's recommendations for OIG annual workplan are sent to the IG.
	140	87:1 to 87:7	3.29.215.B.	Commissioners' geographic distribution must allow for assignment to Council districts in accordance with 3.29.215.A.2.
T	141	87:1 to 88:11	3.29.215.B.	Commissioner qualifications are reorganized to group similar concepts together.
	142	88:8 to 88:9	3.29.215.B.4	One Commissioner must represent SPOG and one Commissioner must represent SPMA.

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T	143	88:19	3.29.215.B.5	Deletes “basic” as an unnecessary modifier to “constitutional rights”
	144	89:17	3.29.215.B.5	The quality of Commissioners to reflect sound judgment, as opposed to being perceived by those with a stake in policing as having sound judgment, is a correction that was made pre-transmittal for the IG. This makes the change for CPC.
	145	90:17 to 94:11	3.29.215.C.	CPC shall have 21 members: <ul style="list-style-type: none"> • 7 selected by CPC; 7 selected by Mayor; 7 selected by Council • CPC shall select the public defense, civil liberties law, SPOG, and SPMA positions • The positions have staggered terms with each third of the Commissioners having terms that expire together • Note: The details of this process require further revision.
T	146	93:18	3.29.215.C.	Corrects typo “than” to “that”
	147	94:10	3.29.215.C.7	Clarifies that majority vote of Council to remove Commissioners is a majority of the full Council.
	148	94:12 to 95:23	Section 34	Decodifies the transition appointment method for current Commissioners.
	149	96:10 to 96:12	3.29.220.A.2	CPC annual report language clarifies that CPC reports on prior recommendation status for other City departments and offices, not just SPD and OPA.
	150	96:14 to 96:16	3.29.220.A.3	CPC annual report language clarifies that CPC recommendations include collective bargaining agreements, City ordinances, and state laws (consistent with the previous collaborative oversight revisions to 3.29.009.B.).
	151	96:19 to 96:22	3.29.220.B.	CPC, in partnership with OIG, shall periodically report on how SPD is meeting diverse workforce needs.
	152	97:4 to 97:10	3.29.225	Deletes language as part of consolidation of collaborative conversations and duty to advise.
	153	67:4 to 67:5	3.29.225	Changes CPC public meeting from at least once a month to at least eight times per year.
T	154	97:11	3.29.225	Clarifies that CPC public meetings means open to the public.
OTHER MECHANISMS				
T	155	98:3 to 98:4	3.29.300.B.	SPD administrative investigation limit of 90 days is moved to a section about those units.
T	156	98:12	3.29.300.E.	Clarifies that “entities” are “departments and offices”
	157	98:12	3.29.300.E.	Changes duty of entities to “report” problems to OIG to a duty to “inform” the OIG, as part of report streamlining.
	158	99:2 to 99:9	3.29.305.A.	For 30-day response required for written reports by OPA/OIG/CPC, changes it to written recommendations, as part of report streamlining.
	159	100:3 to 100:5	3.29.305.C.	Quarterly meeting to review recommendations with OPA Director, IG, CPC Commissioner, and Chief

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	160	100:6 to 100:7	3.29.305.D.	Requires SPD to respond in writing to any training referral or supervisor action with an explanation of actions taken (moved from definitions section).
	161	100:17 to 100:19	3.29.305.E.	Deletes SPD/OIG performance mentoring/EIS reporting.
	162	100:20 to 100:22	3.29.305.F.	Deletes requirement that Council establish a regular schedule for review of recommendation statuses.
	163	104:18 to 104:22	3.29.315.A.	Duty to report on diverse work force is changed from SPD to OIG and CPC.
	164	105:3	3.29.315.A.	When SPD develops recruitment and other practices, SPD shall consult with OIG in addition to CPC.
	165	105:16	3.29.315	When SPD establishes a secondary employment office, SPD shall consult with OPA and CPC in addition to OIG.
	166	106:21	3.29.315	When developing in-service training, SPD shall consult with CPC in addition to OPA and OIG.
	167	109:17 to 109:23	3.29.335	Delete section – admin investigation 90-day time limit was moved; body-worn video policy was already submitted to court for consideration.
T	168	Various	Various	Renumber sections.
T	169	Various	Various	Change “agencies” to “offices” throughout.
T	170	Various	Various	Capitalization fixes, including “Department” and “City” where applicable; deleting “the” in front of any entity acronyms.