

Special Events - Police Staffing and Cost Recovery

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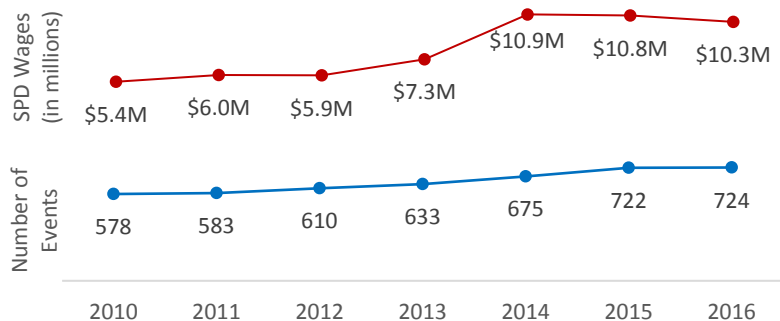
Special Events - Police Staffing and Cost Recovery

Report Highlights

Background

The Seattle Police Department (SPD) provides police staffing at many types of special events held in Seattle, including parades, protests, marathons and other athletic events, professional sports games, concerts, community festivals, and dignitary visits. In 2016, SPD spent 150,748 hours and \$10.3 million in wages staffing 724 special events with sworn and non-sworn personnel.

SPD Special Event Wages and Number of Special Events, 2010-2016



Source: Office of City Auditor analysis of SPD payroll data, in which most events were coded with a unique ID. In some cases, multiple events were coded with the same ID.

Event organizers can obtain police staffing in different ways, and some organizers are charged for a portion of the costs the City incurs when providing police staffing at events. For example, events held in parks, City-owned properties, or other public places that meet certain criteria require a City special event permit. **Permitted** events that are categorized as Free Speech, Mixed Free Speech, or Community are not charged for police staffing, but Commercial, Athletic, and Citywide events are charged a police services fee. For other types of events, SPD provides police staffing through a Memorandum of Understanding (MOU) or a contract with the event organizer (i.e., **reimbursable** events).

This audit assessed SPD's processes for staffing special events. We also reviewed elements of the new special event permit process implemented in 2016 in accordance with Ordinance 124860. This process is administered by the Special Event Office (SEO), which is



WHY WE DID THIS AUDIT

Ordinance 124860, passed by the Seattle City Council in September 2015, directed our office to review SPD's staffing of permitted events.

HOW WE DID THIS AUDIT

- Observed the Special Events Office (SEO) permit processing and SPD's event staffing functions;
- Analyzed SPD payroll and SEO permit data;
- Analyzed Seattle's cost recovery rates for police staffing of special events;
- Tested SPD and SEO special event staffing and permit documentation;
- Researched event police staffing best practices and guidance;
- Surveyed four cities about their practices for staffing special events;
- Attended five special events in Seattle;
- Interviewed SPD and SEO leaders, and other City officials; and
- Reviewed SPD's and SEO's policies and procedures, reports, and other documents related to SPD staffing and cost recovery for special events.

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managed by the Office of Film + Music (OFM) in the Office of Economic Development (OED). Further, we examined the City's cost recovery rates for different types of special events, including reimbursable events. We covered these reimbursable events in our audit because they are a significant component of SPD's total special event workload, and we wanted to ensure our analysis of SPD hours and wages included all special events work and not only that for permitted events. The audit scope did not include evaluating the policing strategies or tactics SPD employs at special events.

What We Found

We organized the issues we identified into three categories:

- **Police Fees and Cost Recovery** – The City has six methods for calculating SPD police fees at special events, and they recover varying levels of SPD's costs. Some of the methods do not recover all wages for officers working at special events, and none recover all benefit costs and other expenses that the City incurs when officers work at events. Further, the 2015 revised Seattle Municipal Code (SMC) for permitted special events defines Community and Mixed Free Speech event categories such that some events with significant commercial activity receive police services at no charge. The SMC does not provide a schedule or criteria for cost recovery related to Citywide events (e.g., Torchlight Parade).
- **SPD Event Planning and Staffing** – SPD generally follows federal best practice guidance for determining event staffing levels. However, SPD should continue its efforts to improve oversight of event staffing decisions and its policies and procedures related to special events (e.g., documentation of when plans require independent review, how after action information should be documented). We identified inefficiencies in SPD's processes due to a lack of automated scheduling tools, and we found that SPD does not regularly track event staffing and cost data by event and event type. Further, at many special events, SPD sworn personnel perform work that is primarily traffic-directing. Some of this work could possibly be performed by less expensive non-sworn personnel. In 2016, this work totaled about \$3.2 million in sworn personnel wages.
- **Special Events Administrative Functions** – The controls over many special event police services administrative functions need improvement. There are inefficiencies with SEO's permit application processing due to a lack of system tools. Controls need to be documented to ensure sufficient segregation of duties for billing and payment processing functions, and there is a lack of incentives for timely payment of the City's special event fees. Reimbursable event billing is not reconciled to actual hours worked by SPD personnel to help ensure that all hours are properly billed to event organizers, and event-level reporting is not regularly produced and provided to City decision makers. There are also issues with SPD not coding all special event time to the event activity code, entry of event time into SPD's payroll system, and a lack of reporting about SPD's event costs and the fees charged to event organizers.

Recommendations

Our report includes 19 recommendations to improve controls over special events cost recovery, police staffing, and administrative functions. The following is a summary of our recommendations by general category:

1. **Police Fees and Cost Recovery** – SPD should update its MOU and event billing processes to include accurate direct cost information and bill for all costs allowable under its contracts with event organizers. Further, given that Ordinance 124860 has been in effect for over a year, the City Council and SEO could consider assessing the results of current permit fee policies to determine if they are aligned with the City’s intentions. Given the level of commercial activity at some Community and Mixed Free Speech events (which are not charged for police services), the City should review and consider updating the definitions of these types of events in SMC 15.52. In addition, the City should consider establishing criteria and a schedule for setting police service fees for Citywide permitted events.
2. **SPD Event Planning and Staffing** – SPD needs to establish written policies and procedures covering special event planning, implement improved controls over plan reviews and planning documentation, such as after action reports, and begin regular tracking of event staffing and cost trends. SPD should pursue technology solutions to automate some event staffing and planning functions. In addition, the City Council and the Mayor should evaluate the traffic-centric special events work SPD sworn officers perform and consider using non-sworn personnel for some of it. The latter would require a change to SMC 11.50.380 addressing the authority to override traffic signals.
3. **Special Event Administrative Functions** – SEO should update its procedures and ensure controls are adequate over permit fee invoicing, customer account maintenance, and payment handling to ensure proper segregation of duties. SEO should implement a reconciliation process to ensure customers are refunded or billed for actual police hours worked, and it should improve controls over delinquent accounts. SEO should pursue a technology solution to improve permit administration controls and efficiencies. SPD should reconcile reimbursable event invoices to actual hours worked and should improve controls over event numbering and tracking, time-coding, and recordkeeping. Event-level reporting that shows SPD expenses and revenues should be produced regularly and distributed to key special events decision makers in SPD, SEO and Seattle Center so they are better informed about the costs of event plans.

SPD’s and OED’s Formal Responses to the Audit

In their formal, written responses to our report (see Appendix F and G), 1) SPD stated that they generally concurred with the report findings, and 2) OED stated they disagreed with some of our findings. We address OED’s responses to our findings in Appendix G.

TABLE OF CONTENTS

INTRODUCTION	1
POLICE FEES AND COST RECOVERY	10
EVENT PLANNING AND STAFFING	25
SPECIAL EVENT ADMINISTRATIVE FUNCTIONS	39
OBJECTIVES, SCOPE, AND METHODOLOGY	47
APPENDIX A Payroll Data Analysis and Conclusions	51
APPENDIX B Data Tables	65
APPENDIX C Special Event Staffing Analysis	85
APPENDIX D Methodology for Calculation of Direct Costs	90
APPENDIX E Survey of Other Cities	95
APPENDIX F Department's Response – Seattle Police Department	107
APPENDIX G Department's Response – Office of Economic Development (Special Events Office) – and Office of City Auditor's Response to the Special Events Office Letter	113
APPENDIX H Seattle Office of City Auditor Mission, Background, and Quality Assurance	122

INTRODUCTION

Audit Overview

We conducted a performance audit of special events police staffing and cost recovery. The audit primarily involved the policies, procedures, and practices of two City of Seattle (City) entities: the Seattle Police Department (SPD) and the Office of Economic Development's (OED) Special Events Office (SEO). The audit scope did not include evaluating the policing strategies or tactics SPD employs at special events.

The areas included within the scope of our audit were:

Police Fees and Cost Recovery – fees charged for police services for different types of special events and the amount of SPD's costs recovered by these fees;

SPD Event Planning and Staffing – SPD processes related to planning event police staffing, including determining and evaluating staffing levels; and

Special Events Administrative Functions – SPD payroll and accounting functions, SPD and SEO event tracking, SPD event reporting, SEO permit application and review, SEO permit processing, and SPD and SEO billing and payment handling for police services fees.

Background – Ordinance 124860

The City Council passed Ordinance 124860 on September 29, 2015, which revised Seattle Municipal Code (SMC) Chapter 15.52, and covers the special events permit process, fees, and rules. Before the ordinance's passage, the City's model for calculating special event permit fees was based primarily on the number of attendees at an event and the type of event (e.g., sports or non-sports and whether the event charged participants an entry fee) rather than the amount of City resources spent supporting the event. Ordinance 124860 revised the City's special event fee structure to better reflect the type and quantity of services received.

SMC 15.52 related to permitted special events was enacted in 1991. From 1991 to 2011, the special events permit coordination process was managed by the Department of Parks and Recreation. In 2012, the City Council moved this function to the Office of Economic Development to model it after the Office of Film + Music's (OFM) Master Film Permit coordination process, and to lead policy work in reviewing and updating the City's special event ordinance. Since 2012, all special event permit coordination and Special Event Committee chairmanship and

management have been staffed by OFM staff, which is embedded within OED, hereinafter called the Special Events Office (SEO).

During the ordinance's development, SEO researched peer city special events policies and worked with the City Budget Office (CBO) and several City departments to analyze the City's costs associated with special events. CBO staff reported to us that, although several departments incur costs related to special events, the largest component of the City's total cost is the expense of SPD personnel (i.e., sworn and non-sworn) providing police services at special events. They estimated that SPD's personnel costs are about 80% to 90% of the City's total special events costs.

In response to the research on costs, a separate SPD fee was added to the ordinance for some types of events that is based on an estimate of the hours SPD personnel will work at an event. Events categorized as Athletic and Commercial pay a fee that is calculated by multiplying the total number of hours by the hourly rate of \$67 per officer. The ordinance also created a Citywide event category, for which police fees are negotiated, and categories for Community, Parade, Free Speech, and Mixed-Free Speech events, which are not charged the SPD fee.

Further, the ordinance required the City Auditor's Office to conduct an audit of SPD's process for staffing of special events, and to review the planning, authorization, staffing levels, attendance, and payment of the officers for permitted events under SMC Chapter 15.52. This audit addresses the ordinance requirements, and covers cost recovery for special event police staffing. It also covers reimbursable special events, which are events that receive police services from SPD based on a Memorandum of Understanding (MOU) but generally are not required to get a special event permit, such as police services for Seattle Seahawks games.

We included a review of the City's cost recovery of special events police staffing costs, because cost recovery was cited in Ordinance 124860 as a reason for revising the special event fee structure. Additionally, SPD's sworn officers are an expensive and limited resource, and we wanted to examine the degree to which the City recovers the costs incurred when officers work at special events.

The audit scope also included reimbursable special events because they are a significant component of SPD's total special event workload, and we wanted to ensure our analysis of SPD hours and wages included all special events work, not only that for permitted events. We included reimbursable events in our cost recovery analysis so that we could compare the City's multiple methods for recovering the costs of providing police services at special events.

Definitions of Permitted and Reimbursable Special Events

Permitted Special Events:

Under SMC 15.52, a Permitted Special Event is:

1. An event planned to be held in a park, other City-owned property, or public place that meets all four of the following criteria:
 - a. The event is reasonably expected to cause or result in more than 50 people gathering in a park (or other public place), other City-owned property, public place, or waterway; and
 - b. The event is reasonably expected to have a substantial impact on such park, other City-owned property, public place, or waterway; and
 - c. The event is reasonably expected to require the provision of substantial public services; and
 - d. The event will require the temporary closure or exclusive use of a public place or waterway; or
2. An event planned to be held on private property that meets all three of the following criteria:
 - a. The event is reasonably expected to have more than 500 people in attendance at any one time; and
 - b. The event is reasonably expected to have a substantial impact on a park, other City-owned property, or public place; and
 - c. The event is reasonably expected to require the provision of substantial public services; or
3. Any other planned event in a park, other City-owned property, or public place if the event organizer requests the City to provide any public services or the Special Events Committee determines public services will be needed to safely produce the event in addition to those that would normally be provided by the City in the absence of the event; or
4. An event held in a park, other City-owned property, or public place, excluding the Seattle Center area, that will have alcohol sales available to the general public and/or event participants.

Reimbursable Special Events:

In this audit, we also looked at SPD's processes and cost recovery for many types of **Reimbursable Special Events**. Reimbursable Special Events receive and pay for police services through an MOU with SPD and generally are not required to get a special event permit. For example, professional sports events at Safeco Field or small festivals at the Seattle Center are handled as Reimbursable Special Events, as they often do not get a permit and receive police services through an MOU with SPD.

Permitted Event Category Definitions, in accordance with SMC 15.52:

"Free speech event" means an event, other than an athletic, commercial, community, or citywide event, that consists solely of expressive activity. "Free speech event" does not include any event that includes any commercial activity such as commercial food or sales vendors.

"Mixed free speech event" means an event, other than an athletic, commercial, community, citywide, or parade event, that includes expressive activity but also includes non-expressive or commercial activity (e.g., commercial food or sales vendors).

"Citywide event" means:

- a. The following events: Fremont Solstice Parade; My Macy's Holiday Parade; Seafair Hydroplane Races and Blue Angel Weekend; Seafair Summer Fourth on Lake Union; and Seafair Torchlight Parade; and
- b. An event that has one or more of the following characteristics:
 - i. The event can be viewed by the public outside of the immediate event footprint or boundaries;
 - ii. The event is expected to draw a significant citywide and/or regional crowd;
 - iii. The estimated amount of total police officer hours to be assigned to the event is anticipated to exceed 300 hours;
 - iv. The event is a recurring event held in Seattle for at least 15 of the last 20 years;
 - v. The event is a celebration of a local, regional, or Federal holiday;
 - vi. The event is a celebratory parade or event for a local team winning a major national competition; or
 - vii. The event would not typically be defined as an athletic event, commercial event, free speech event, or mixed free speech event.

"Athletic event" means an event with one or more of the following characteristics:

- a. The event is a gathering of people, many of whom participate in an athletic activity, sport, or in physical exertion including running, walking, bicycling, swimming, and other race, recreational, or competitive contest;
- b. Participation in the event typically requires individual or team registration and/or a type of payment or entry fee (such as a registration fee);
- c. Participation is generally not free or open to all members of the public;
- d. The event is primarily to raise or solicit funds whether for profit, for non-profit fundraising, or otherwise; or
- e. The event is organized by a for-profit or non-profit entity.

"Commercial event" means an event with the purpose to promote, for monetary profit, gain or advantage, a business, product, service, commercial performance, venue, professional or college team or similar organization, or current or future for-profit event conducted by a private person or entity regardless of such person or entity's profit or non-profit status. In addition, a commercial event has one or more of the following characteristics:

- a. The event may or may not be open to all members of the public;
- b. The event has controlled or ticketed entry (e.g., tickets, pay-upon-entry, or suggested donation posted at the entrance);
- c. The event name features the name of a for-profit or non-profit business or organization;
- d. The event is concentrated around a single storefront, building, or is an extension of activity within a store or place of business (such as a grand opening);
- e. The event is primarily to raise or solicit funds whether for profit, for non-profit fundraising, or otherwise; or
- f. The event may be organized by an individual or a non-profit or for-profit entity.

"Community event" means an event with one or more of the following characteristics:

- a. The event is free and open to all members of the public;
- b. The event provides a public benefit and/or stimulates economic or cultural activity within a neighborhood or neighborhood business district that benefits multiple locally owned businesses and/or organizations (including street fairs and block parties in which multiple locally owned businesses will participate);
- c. The event is organized by neighborhood-based groups, community-based organizations, ad-hoc groups, business groups (such as chambers of commerce), or groups that do not have a geographic base (such as racial or ethnic groups, LGBTQ groups, cultural groups, or a disability community);
- d. The event has received a government grant to produce the event (not including sponsorships);
- e. The event is organized by a non-profit entity; or
- f. The event is anticipated to require less than 300 hours of police officer time.

Types of Events Staffed by SPD

SPD is responsible for ensuring public safety in Seattle through patrol operations, incident response, and specialized units (e.g., Bomb Squad, Traffic). SPD also provides police services for many special events. For the purposes of this audit, we are considering the following types of activities to be special events:

- Parades
- Music festivals
- Street fairs and community festivals
- Run/walk and other athletic events
- Protests and other free speech events
- Professional sports events
- Events at Seattle Center and Key Arena (e.g., festivals, concerts, sports)
- Local and regional high school dances, athletic events, and graduations
- Some corporate events requiring SPD's services
- Dignitary visits

We placed events into the 16 categories listed in Exhibit 1 below. The exhibit shows that in 2016, SPD personnel worked at **724** special events and earned a total of **\$10.3 million** in wages. Of these events, about 236 were permit-type events.¹

Appendices A and B contain the detailed results of our analyses of SPD payroll data on the number of events that had SPD staffing between 2010 and 2016 and the total hours and wages SPD personnel charged working at events. Appendix B includes our analysis by event category for each of the 16 categories listed in Exhibit 1.

¹ This number represents the number of Athletic, Citywide, Commercial, Community, Free Speech, and Mixed Free Speech events to which SPD hours were coded. Many permitted events do not obtain police services. Also, some events that meet the requirements for a permit do not obtain one (e.g., some Free Speech events). According to SEO, there were 339 special events permits issued in 2016.

Exhibit 1: Audit Categories of Special Events and 2016 Event Costs (in SPD Wages)

Audit Event Category	2016 SPD Wages	Percent of 2016 SPD Special Event Wages	Were Some of SPD's Wages Reimbursed?
1. Professional Sports Games (Mariners, Reign, Seahawks, Storm, Sounders)	\$ 2,600,020	25%	Yes
2. Free Speech Events	\$ 1,659,362	16%	No
3. Citywide Events	\$ 1,318,999	13%	Yes
4. Community Events ²	\$ 796,507	8%	No
5. Dignitary	\$ 605,434	6%	Yes
6. Athletic Events	\$ 536,303	5%	Yes
7. Commercial Events	\$ 476,094	5%	Yes
8. Mixed Free Speech Events	\$ 428,553	4%	No
9. Large Seattle Center Festivals	\$ 427,411	4%	Yes
10. UW Husky Stadium and Hec Edmundson Pavilion Events	\$ 351,395	3%	Varies ³
11. Stadium (Safeco/ Century Link/WAMU Theater, etc.)	\$ 326,392	3%	Yes
12. Seattle Center MOU Events	\$ 324,965	3%	Yes
13. Film	\$ 136,911	1%	Yes
14. Other Reimbursable Events	\$ 124,109	1%	Yes
15. High School Event - Local and Regional	\$ 115,533	1%	Yes
16. SPD Event Emphasis Patrol ⁴	\$ 77,060	1%	No
Total:	\$ 10,305,048	100%	

Source: Office of City Auditor analysis of SPD's payroll data.

² The numbers in this category also include Parade events.

³ For traffic services at University of Washington Husky Stadium football games, the City receives a portion of the Admission Tax, which is designated to support the activities of the City's Office of Arts and Culture. SPD has agreements with the University of Washington for SWAT and bicycle police services at UW football games, and traffic services for UW men's basketball games and UW Commencement. SPD had an MOU with a private organization for a Jehovah's Witness event that occurred at Husky Stadium in 2014.

⁴ Event emphasis patrols are additional patrols needed outside of the perimeter of a special event due to increased security risk in the area because of the event. The wages paid amount included in Exhibit 1 is understated because some SPD event emphasis work is not coded to the event's Activity ID (see our finding on this issue in Section 1).

Event organizers can obtain police services for events in different ways.

1. **Special Events Permit:** Events that are held in parks, City-owned properties, or other public places and meet certain criteria require special events permits and are governed by SMC Chapter 15.52 Crowd Control Events. We refer to these types of events as **permitted events**. The types of events that need permits include parades, protests, large annual events (e.g., 4th of July Fireworks), music festivals, street fairs, and athletic events (e.g., marathons and bike races). Permit applicants may request police services, and this request is reviewed by SPD and the Special Events Committee.⁵ Some types of events pay for police services, based on estimated police hours, and some do not. The Special Events Office (SEO) administers the special events permit functions. Key decisions about permitted events are made by the Special Events Committee, which is currently chaired by the SEO Manager, and consists of representatives from twelve City departments, King County Metro, Seattle and King County Public Health, and the Washington State Liquor and Cannabis Board.
2. **MOU with SPD (reimbursable events):** Some event organizers contract directly with SPD for police staffing. SPD generally charges for its services based on MOU terms that specify that actual direct hourly wages will be charged, but sometimes the MOUs set a specific dollar amount. We refer to these events as **reimbursable events**. Types of reimbursable events include professional sports events at CenturyLink and Safeco fields, the large Seattle Center festivals, events held in some Seattle Center venues (e.g., Fisher Pavilion and Exhibition Hall), some large corporate events (e.g., Microsoft shareholder's annual meeting), public high school dances, film shoots,⁶ and various smaller events.
3. **Seattle Center MOU with SPD:** Seattle Center contracts with SPD for police services at many of the events held on its grounds and pays SPD a negotiated hourly rate for these services. Seattle Center receives police services under this MOU for many of the festivals, concerts, and sports events held

⁵ Permitted event organizers may or may not request police staffing for their events, but SPD decides whether there will be SPD personnel at the events.

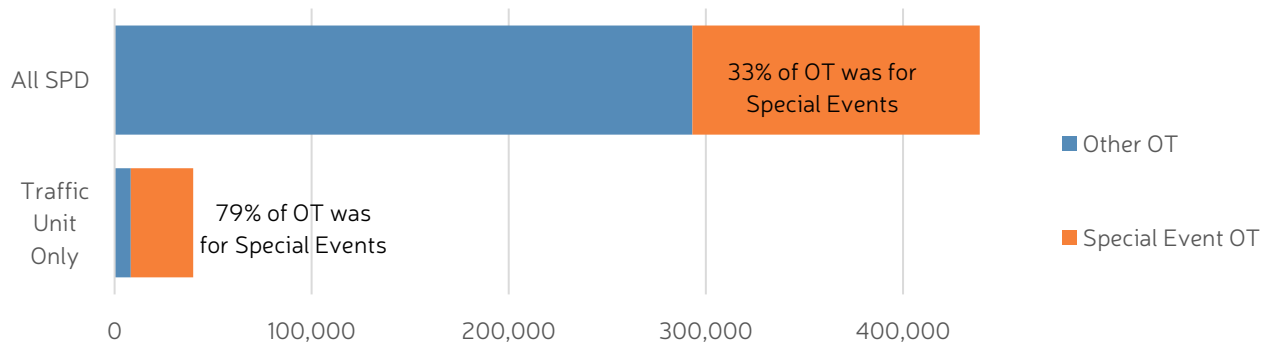
⁶ Film shoots are required to obtain Film Permits instead of Special Events Permits but police services are obtained through a direct contract with SPD.

in Key Arena and for traffic control services for Mercer Garage.⁷ We refer to these events as **Seattle Center MOU events** or include them with other **reimbursable events**.

SPD Resources Dedicated to Special Events

SPD spends a considerable amount of resources staffing special events. In 2016, SPD spent **150,748** hours and **\$10.3 million** in wages on work related to special events. The hours spent working at special events accounted for over 3 percent of all department hours, and, as shown in Exhibit 2 below, special events work conducted on overtime accounted for over 33 percent of SPD’s total overtime hours. SPD’s Traffic Unit spends a large percentage of hours working on special events. In 2016, special events work accounted for over 21 percent of all hours worked by the unit and over 79 percent of the unit’s overtime hours. In 2016, sworn Traffic officers worked **33,999** hours and earned **\$2.5 million** in wages working special events.

Exhibit 2: SPD and Traffic Unit Overtime Hours (OT) for Special Events, 2016



Source: Office of City Auditor analysis of SPD’s payroll data.

⁷ As described above, in the section labeled MOU with SPD (reimbursable events), Seattle Center’s three largest festivals (Bite of Seattle, Folklife, and Bumbershoot) receive police services based on separate MOUs with SPD. Additionally, many smaller events at Seattle Center venues also receive police services through individual MOUs with SPD.

SPD Special Event Trends

As shown in Exhibit 3 below, the number of special events increased between 2010 and 2016. SPD’s event staffing costs (displayed below as wages earned by SPD personnel) and the hours SPD personnel spent working at special events increased at a higher rate during the same period, particularly between 2012 and 2014. In 2015 and 2016, SPD’s wages for staffing special events decreased, even as the number of events continued to grow or stayed about the same. We calculated number of events using Activity IDs in SPD’s payroll data. It is important to note that in some cases SPD uses a single Activity ID for multiple events. For example, a single Activity ID was used to track the hours and costs SPD spent staffing multiple 2014 and 2015 protests after the Ferguson, Missouri Grand Jury Findings.

Exhibit 3: Number of Special Events and SPD Special Event Hours and Wages, 2010-2016

	Number of Events	Hours	Wages
2010	578	87,312	\$5,417,559
2011	583	94,970	\$5,959,646
2012	610	93,317	\$5,930,211
2013	633	110,065	\$7,251,627
2014	675	158,442	\$10,920,740
2015	722	160,202	\$10,823,881
2016	724	150,748	\$10,305,048

Source: Office of City Auditor analysis of SPD and SEO data.

While some SPD special event work is conducted during regular work hours, most of it is worked on overtime. SPD personnel explained to us that events are often worked on overtime because regular patrol staffing is already strained. Between 2010 and 2016, of the hours SPD personnel reported that they worked at special events, 95 to 97 percent was worked on overtime and 3 to 5 percent was worked on regular time.⁸

⁸ As noted in our report on page 42, SPD personnel may be underreporting their use of regular time for special events.

POLICE FEES AND COST RECOVERY

Section Overview

In this section, we describe the City of Seattle's (City) six different methodologies for charging for police services at events, including those administered by the Special Events Office (SEO) for some permitted events and by the Seattle Police Department (SPD) for reimbursable events (i.e., events for which the event organizer contracts with SPD for police services).

Not all events are charged for police services. Free Speech events and permitted events categorized as Community or Mixed Free Speech are not charged for police staffing. This section focuses on the types of events that are required to pay for police services, including permitted events that were categorized as Commercial or Athletic (e.g., a marathon or ticketed festival), permitted Citywide events (e.g., Seafair Hydroplane Races and Blue Angels Weekend), and events that paid for police services through an agreement directly with SPD (e.g., small private events, events at the Seattle Center, and professional sports events at CenturyLink and Safeco Fields).

In addition to providing information about the overall degree of cost recovery achieved by the City's different billing methodologies, we also describe specific SPD costs associated with events that either are not billed to any events or are not consistently billed. In this section, we recommend that SPD include these costs when billing under Memorandums of Understanding (MOUs) or contracts that specify reimbursement is for actual costs. For permitted events, we make recommendations that will help ensure implementation of the fee structure created by Ordinance 124960 is aligned with the City's intentions.

Further, we make recommendations to improve SPD's tracking of event-related hours and costs, increase communication between SPD and SEO about the actual number of hours SPD personnel work at events, and help ensure that events that should be charged for police services obtain either a special event permit or a contract with SPD. We also recommend that SPD and SEO evaluate the workload related to event planning and administration and consider whether current staffing levels are sufficient.

Different Methodologies for Calculating Fees for Police Services at Special Events

Seattle uses six different methodologies to calculate fees for special event police services:

1. **Flat Hourly Rate for Estimated Hours for Permitted Commercial and Athletic Events** – Permitted events that are categorized as Commercial or Athletic pay an hourly rate that is based on, but discounted from, average SPD overtime rates. In 2016, the rate was \$67 per hour, and hours are estimated and billed before the event. Permitted events that are categorized as Community, Free Speech, or Mixed Free Speech do not pay for police services.
2. **Negotiated Charge for Permitted Citywide Events** – Events that are listed in Ordinance 124860 as Citywide pay a negotiated charge for police services. In 2016, this charge ranged from \$0 to over \$80 per hour for police services.
3. **Flat Hourly Rate for Actual Hours for Seattle Center Events** – Many Seattle Center events (e.g., Key Arena events) are charged for police services under an MOU between SPD and the Seattle Center at the flat rate of \$73 per hour of actual police service. Seattle Center’s MOU with SPD does not apply to the Seattle Center’s large festivals (i.e., Bite of Seattle, Folklife, and Bumbershoot) or to events that rent the Seattle Center’s other venues (e.g., Fisher Pavilion, Armory Loft, or the many outdoor spaces on the campus).
4. **Actual Hourly Wages Without Benefits** – Events at CenturyLink Field and Safeco Field (including the exhibition halls at the stadiums) are charged for police services under Memorandums of Understanding (MOU) with SPD. These events are charged at the actual hourly rate of the officers who work the events for the actual number of hours worked. These events are not charged for benefits or other incurred costs, although the MOUs indicate that SPD should charge actual staffing costs.
5. **Actual Hourly Wages with Benefits** – Some smaller events (including some events at the Seattle Center) receive police services under separate MOUs with SPD. These MOUs generally specify that the event organizer will reimburse SPD at the actual hourly rates of the officers who work the events for the actual number of hours worked. Many of these MOUs include reimbursement for some costs in addition to wages, such as some benefits costs.
6. **Negotiated Charge for Seattle Center Festivals** – The three large festivals at the Seattle Center (Bite of Seattle,

Bumbershoot, and Folklife) negotiate with the City to establish a charge for police services. In 2016, these negotiated charges resulted in effective hourly rates ranging between \$1.73 and \$40 per hour for total police hours worked.⁹

These different methodologies for billing for police services are administered by different entities and were designed for different purposes. For example, the Special Event Permit Police Department Fee, created by Ordinance 124850 for some permitted events, is administered by SEO. It was not intended to fully recover the costs of police staffing at events. Rather, it was designed to recover portions of SPD costs, based on the type of event. In contrast, for those events that obtain police services through an MOU or contract with SPD, SPD administers the contract and billing processes, and the contracts are often written to recover the actual costs of police staffing. One result of the different methodologies for calculating police service fees is that event organizers pay different amounts for police staffing.

None of the Methodologies Recover the Full Cost of Police Staffing

None of the six methodologies described above charge the equivalent of SPD's direct costs in providing police services, which means that the City is not fully recovering these costs for either permitted or reimbursable special events. Direct costs include all expenses incurred as a result of the special events work, including wages paid, benefits expenses, vehicle and equipment usage expenses, and incidental expenses (e.g., food, water, supplies).

Some of the methodologies discount the hourly cost for police services, none charge for all the benefit costs associated with officers working events, and some events do not pay for all the hours worked. Moreover, none of the methodologies bill for any planning hours, the cost of the SPD's Special Operations Center (SPOC) Unit,¹⁰ or incidental expenses (e.g., food, water, and supplies).

Permit Fees Generally Do Not Fully Recover Officers' Wages

One of the reasons cited in support of Ordinance 124860, which created a new model for calculating special event permit fees, was that the existing fee structure did not allow the City to recover a reasonable amount of its costs for supporting special events. The revised model was not intended, however, to recover full costs, but to recover portions of costs based on event type (e.g., Commercial or Free Speech).

⁹ Northwest Folklife Festival was charged the equivalent of \$1.73 per hour of police work, Bite of Seattle \$25 per hour, and Bumbershoot \$40 per hour. Northwest Folklife pays for SPD services for security for its money room but does not pay for SPD services for the festival itself. Seattle Center officials told us this arrangement was based on decisions made by elected officials.

¹⁰ SPOC is the unit responsible for planning most of SPD's special events work.

For all permitted events in 2016 that could be charged for police services (i.e., Athletic, Commercial, and Citywide events), we identified an average cost recovery rate of about 27 percent of SPD's wages. For 2016 Athletic and Commercial events alone, the cost recovery rate averaged about 60 percent of wages, and it averaged about 4 percent for 2016 Citywide events.

We also reviewed a sample of 2016 permitted events and found that cost recovery of SPD wages for these individual events ranged from 13 percent to over 100 percent. The events in our sample included a mix of event types that are charged for police services, including athletic events (i.e., run, walk, and cycle events), a block party, a beer festival, corporate events, a harbor athletic event, a professional sports celebration, and a holiday celebration event.

The rate of recovery of wages for permitted events that are charged for police services is the result of two factors: (1) the hourly rate charged and (2) the number of hours billed.

Hourly Rate: In 2016, permitted events that were required to pay the Police Department Fee were charged \$67 per hour for police services. In establishing the \$67 hourly rate, the average overtime rate for SPD officers of \$73 was discounted by 10 to 15 percent. Future cost recovery is further limited by the ordinance cap on police fee increases of 10 percent per year, using 2017 as the base year.¹¹

Hours Billed: Additionally, not all SPD hours worked at events were billed to event organizers. In 2016, SEO charged event organizers for a total of \$629,566 for 9,397 hours of police work.¹² Our analysis indicates SPD's 2016 costs in wages were \$2,288,511 for 33,228 hours for permitted events in categories that are charged for police services.¹³

There are multiple reasons **permitted** events are not billed for the actual number of SPD hours worked:

- **Work Start and End Time Billed:** Ordinance 124860 states the fee for SPD services will be "calculated by multiplying the number of officers required to safely manage vehicle or waterway traffic and a reasonable number of officers within the event footprint to ensure safety and security by the number of hours per officer by a rate of \$67 per officer per hour." In practice, permitted events are billed for police hours based on

¹¹ Ordinance 124860 also states the following: "Without including any phase-in discount, when the police department fee is established for an event for the first time, if an event is a repeat event taking place in the same general time, place, and manner as it did in the previous year, and no documented issues during previous years' events would demand the need for additional officer support, the police department fee for an event shall not increase by more than ten percent from the previous year."

¹² This does not factor in the 2016 50% permit fee phase-in discount, so event organizers paid less than this amount.

¹³ This includes Athletic, Commercial, and Citywide permitted events.

the event start and end times or street closure times, plus an additional 30 minutes (to allow for SPD personnel's travel, briefings, and equipment management). However, actual SPD event roll calls (i.e., when officers are required to report to work for the event) are sometimes hours ahead of event start times to handle people arriving early, clearing streets, set up, and other tasks. Further, officers' work sometimes continues later than the event end times due to the need for police staffing as the crowd disperses.

- **Hours Charged are Based on Estimates:** SPD provides SEO with limited event staffing information due to security concerns about releasing tactical information (e.g., roll call times and post shift times). Consequently, hours billed by SEO can differ significantly from SPD's actual hours worked. SPD could provide SEO with total planned work hours without releasing sensitive tactical details. Further, although the ordinance states that event organizers may apply for a refund if actual hours worked are less than what was estimated and paid, there is no provision that specifies that the City can bill the event promoter if additional officers worked the event or if additional hours were needed.
- **Minimum Hours per Officer:** Events are charged a two-hour minimum per officer, but SPD collective bargaining agreements guarantee a minimum overtime pay of three hours for an event. This means officers are paid for a minimum of three hours but events pay for a minimum of two hours. The City absorbs the hour difference, when applicable. In contrast to Seattle's practices, Denver, San Francisco, and Portland charge events for a 4-hour minimum per officer.
- **Hours Billed Do Not Include any Event-Related Emphasis Staffing:** According to SPD officials, some events create the need for additional police staffing in the area directly surrounding the event. However, event organizers are not charged for this "upstaffing," as the revised Seattle Municipal Code (SMC) specifies that events are billed only for police hours worked "within the footprint of the event." This is also an issue for some reimbursable events, and we discuss it further below.



Source: Office of City Auditor

2016 Capitol Hill Block Party Example

In 2016, the Capitol Hill Block Party was categorized as a Commercial event and thereby required to pay for police services. The event was charged **\$16,683** for **249** hours of police services. Actual SPD wages for this event, including upstaffing in the area (i.e., police emphasis work), were **\$124,502** for **1,773** hours worked. When all hours worked for this event are included, the City billed for **14%** of the hours worked and recovered about **13%** of total wages. This event costs **\$70 per day** to attend and has an estimated daily attendance of about 9,000.

* This does not factor in the 2016 permit fee phase-in discount that limited the increase in total permit fees for recurring events. Actual 2016 charges were lower.

Some Reimbursable Events Do Not Fully Recover Wages

In contrast to the fee structure for permitted events, SPD's MOUs for reimbursable events with event organizers usually include provisions for recovering the costs of officers' wages at events. For example, MOUs for individual events (e.g., a private fireworks show or a corporate meeting) often specify that organizers will be invoiced for SPD's "actual costs," and SPD's 2016 MOU with the Seattle Center, which applied to most events on Seattle Center grounds, specified that the Seattle Center would be charged for actual hours (with a 3-hour minimum) at a flat hourly rate of \$73, which was equivalent to the average overtime rate for SPD officers.

However, the City is not fully recovering the costs of SPD's wages for the three large Seattle Center festival events (i.e., Folklife, Bumbershoot, and Bite of Seattle). The City bills these events based on negotiated amounts, or caps, not on an estimate of planned hours or actual hours worked.

Two of these events are free and open to the public (Bite of Seattle and Folklife) and one has an entrance fee (Bumbershoot). All three events involve hundreds of vendors that pay to participate and the sale of alcohol. Overall, the cost recovery rate for SPD wages for these three events was **30%**.

- **Folklife 2016** - Folklife was charged **\$4,055** for police services for security for the money room. Total SPD wages and hours worked for the Folklife Money Room and Festival were **\$160,122** and **2,339** hours. This represents a cost recovery rate of **2.5%** of SPD wages. Seattle Center officials told us that Folklife has never paid for police services for the festival event, and that this arrangement was based on decisions made by elected officials

- **Bumbershoot 2016** – Bumbershoot was charged **\$78,500** for **1,136** hours. Actual SPD wages and hours worked were **\$138,834** and **1,977** hours. The cost recovery rate was **57%** of wages. Tickets to attend this event were **\$50 to \$75** per day.
- **Bite of Seattle 2016** – Bite of Seattle was charged a total of **\$45,896** for police services, consisting primarily of a flat negotiated rate of **\$37,012** plus **\$8,884** for overnight security. Actual SPD wages and hours worked were **\$128,456** and **1,837** hours. This results in an hourly charge to the event of about **\$25**, or a cost recovery rate of about **36%**. In 2015, Bite of Seattle was not charged for police services other than **\$8,945** for overnight security; the actual wages and hours worked were **\$135,449** and **1,912**.

Some SPD Special Event Costs Are Not Recovered Under Any of the City's Fee Calculation Methodologies

When SPD officers work at special events, there are costs to SPD directly associated with this work beyond the officers' wages, such as employee benefits and vehicle and equipment usage. When these SPD direct expense items are included, we calculated that the cost recovery rate for the 6 permitted and 7 reimbursable 2016 events we analyzed ranged from about **9%** to **86%**.¹⁴ The following SPD costs are directly associated with Special Events work but are not recovered, or are not fully recovered, for either permitted or reimbursable events:

Direct Employee Benefits Costs: Some employee benefit costs increase when an officer works more hours or earns more pay. These include retirement contributions and Social Security, among others. For some reimbursable events, SPD charges a rate of 6.68% for police officers and 1.45% for Parking Enforcement Officers (PEOs) to account for the added benefit costs, but this is not sufficient to cover all direct benefit costs. We calculate the direct benefit cost to be about 12.9% for police officers and 22.9% for PEOs. Beyond these costs, SPD also pays an additional amount per hour worked of \$0.76 for police officers and \$0.14 for PEOs.¹⁵

Further, we found that most of the reimbursable events are not charged the 6.68% rate for direct benefits. For example, SPD does not bill the Seattle Center or the City's professional sports stadiums for any benefit costs. The rate isn't added for these events, even though the MOUs for

¹⁴ The six permitted events described here includes only events that were charged for police services and does not factor in the 2016 50% permit fee phase-in discount, so the recurring permitted events paid a lower amount than we are reflecting in this analysis. The event with 9% cost recovery was the 2016 Macy's Holiday Parade, which had a Citywide Permit; the event with 86% cost recovery was the 2016 Starbuck's Shareholders Meeting, which had an MOU with SPD.

¹⁵ These amounts include the following employee benefits: Social Security, Medicare, Unemployment Insurance, Workers Compensation, and Retirement. They do not capture all SPD event planning time or emphasis hours. See Appendix C for additional details on our analysis.

Seattle Center events and the professional sports stadiums state that “actual wages and benefits” will be charged. We reviewed five 2016 reimbursable events for SPD’s benefits charge and found that only two were charged SPD’s added benefit rate, even though all five of the MOU’s stated that police service fees were to include “labor and benefits.”

Permitted events also do not pay anything to cover direct benefits costs. In contrast to Seattle, we found that Portland, San Francisco, and San Diego set their hourly police events rates to capture benefit costs.

Regular Time: Event time worked by SPD personnel on regular time is not charged at the “fully loaded” rate for these work hours, which includes the fixed benefits costs and other employee-related fixed costs. In 2016, there were 4,977 hours (and \$165,608) of regular time recorded as special events work, or the equivalent of 2.4 Full-Time Equivalent (FTE) employees. We discuss SPD fixed benefits costs and other fixed costs associated with special events work in Appendix D.

Non-Labor Direct Expenses: SPD uses vehicles, motorcycles, and other equipment to work some special events, and sometimes event supplies, such as water and food, are needed. The City does not charge expenses for equipment usage and supplies to the events. In contrast to Seattle, San Diego sets their hourly police events rate to capture the costs of vehicle usage and other incidental expenses.

In addition to the expenses listed above, there are SPD hours that are worked to support special events but are not consistently tracked as part of the event cost and are not charged to either permitted or reimbursable events. These additional SPD hours include emphasis staffing and event planning time:

Police Emphasis Staffing: SPD officials reported that there is a need for police emphasis staffing outside the perimeter of many special events due to the increased risk of crime around the event. Event organizers are not charged for SPD's emphasis staffing hours, as Ordinance 124860 specifies that events are billed only for police hours worked "within the footprint of the event." This would not include emphasis work even though the need for this work results directly from the event. Further, SPD emphasis staffing costs are not consistently tracked to events in SPD's payroll system, as many hours are coded as regular police work rather than to an event-specific activity ID. This makes it difficult for SPD, SEO, and the City Budget Office to see the true use of SPD resources for these events.

Event Planning and Administration Time: Most SPD event planning and administration time is not charged to the events. SPD's SPOC unit dedicates almost all their time to planning events, SPD's Traffic Unit dedicates a considerable amount of time to event planning, and SPD's precincts and Harbor Unit dedicate time to planning as well.

We recognize that SPD management and City policy makers must consider many factors when deciding how much to charge for police services at different types of events. However, for those MOUs that specify that reimbursement is for actual costs, SPD should invoice for all the costs incurred from SPD personnel working at the event. During this audit, we learned that SPD was working to more fully identify all applicable direct costs associated with events. We recommend SPD continue these efforts and include all direct costs when billing under MOUs that include provisions for recovery of actual costs.

Further, now that Ordinance 124860 has been in effect for over a year, we recommend that SEO and the City Council consider reviewing the level of SPD cost recovery achieved for the types of events that are

Cost Recovery Examples

To illustrate the impact on SPD's special events work by including direct benefit costs and fixed costs for regular time, we estimated the total direct costs (including wages) for a selection of 2016 events:

Bumbershoot:

Wages = \$138,834
 Total Direct Costs = \$175,955
 Invoiced Amount = \$78,500

Capitol Hill Block Party:

Wages = \$124,502
 Total Direct Costs = \$157,666
 Invoiced Amount = \$16,683*

* Invoiced amount listed here does not include 2016 phase-in discount.

Mariner's vs. Milwaukee Game:

Wages = \$16,443
 Total Direct Costs = \$21,076
 Invoiced Amount = \$16,443

A full description of our cost recovery analysis and more examples are in Appendix D – Methodology for Calculating Direct Cost.

charged for police services to ensure results are aligned with City policy makers' intentions.

Finally, SPD should ensure all its event-related work is tracked so that total event costs and hours can be monitored and included in any discussions related to cost recovery or workload, and SPD should provide SEO an accounting of actual hours worked at permitted events. Without reporting on actual hours, SEO cannot refund or bill event promoters for a variance between estimated and actual hours.

Recommendation 1

The Seattle Police Department (SPD) should continue reviewing and updating its special events memorandum of understanding (MOU) and event billing processes to ensure (a) the MOU cost estimate template includes accurate and complete direct cost information and (b) invoices sent to event organizers include non-wage direct costs (e.g., employee benefits and equipment) when they are specified as reimbursable in the MOU or when the MOU states that reimbursement will be for actual or full costs. SPD should also consider charging other event-related SPD costs (e.g., event planning time, event emphasis staffing, equipment maintenance expenses, incidentals such as food, water, and supplies) to all reimbursable events.

Recommendation 2

The City Council and the Special Events Office should consider reviewing the implementation of the new special event permit fee structure created by Ordinance 124860 to ensure the level of recovery of the Seattle Police Department's staffing costs is aligned with the City's intentions. Options that could be considered include:

- a. Charging permitted events for more of the actual police hours worked, including pre-event hours, post-event hours, and hours that exceed the hours that were initially estimated and paid.
- b. Including direct employee benefits and other event-related costs (e.g., event planning time, emphasis staffing, etc.) in analyses of event costs.

Recommendation 3

The Seattle Police Department should ensure all event-related hours are tracked to the events, including event planning hours and emphasis hours.

Recommendation 4 The Seattle Police Department should provide to the Special Events Office (SEO) an accounting of actual hours worked at permitted events so SEO can refund or bill event promoters for any variance between estimate and actual hours.

**Category Definitions
Allow Events with
Substantial Commercial
Activity to be
Considered Community
or Mixed Free Speech
and Receive Free Police
Services**

The categorization of permitted events is important because some event categories pay for police services and some do not. Ordinance 124860 stated that the City “has a compelling interest in preventing taxpayer subsidy of commercial events that promote private gain.” In accordance with Ordinance 124860, events categorized as Commercial or Athletic are required to pay for planned police hours because they generally require paid admission to participate in the event, or are solely for the commercial financial benefit of a singular entity; Citywide events pay a negotiated amount; and events categorized as Free Speech, Mixed Free Speech, Parade, or Community are not charged for police services. Events categorized as Community are always free and open to the general public. Exhibit 4 below shows SPD wages paid and hours worked for 2016 permitted special events by permit category.

Exhibit 4: SPD Wages and Hours for Permitted Special Events by Permit Category, 2016

Permit Event Category	Police Services Fee Charged?	SPD Wages	SPD Hours
Free Speech	No	\$1,659,362	23,115
Mixed Free Speech	No	\$428,553	6,169
Community/Parade	No	\$796,507	11,708
Citywide	Yes Fee is negotiated by Special Events Committee Chair in consultation with the Special Events Committee and SPD	\$1,318,999	18,687
Athletic	Yes	\$536,303	8,359
Commercial	Yes	\$476,094	6,789
Total		\$5,215,818	74,828 hours

Source: Office of City Auditor analysis of SPD and SEO data.

Ordinance 124860 did not prohibit commercial activity at Community or Mixed Free Speech events. Rather, the current category definitions in the Seattle Municipal Code (SMC) allow for events with commercial activity to be categorized as Community or Mixed Free Speech. These events are charged a separate Vendor Fee of \$20 per vendor and an Alcohol Area Fee of \$100-\$200 per alcohol service, but they are not subject to the Police Department Fee.

As a result, there are some events with substantial commercial activity that are not charged for police services. For example, some Community and Mixed Free Speech events have hundreds of vendors that pay large vendor fees to the event organizers (i.e., fees over \$1,000 or \$2,000 per vendor booth and sometimes additional fees based on percentage of sales), alcohol sales, portable ATM's, corporate advertisers, "headline" musicians, professional event organizers, and event attendance in the thousands. SPD reported to us that some of these elements, alcohol for example, create the need for increased police staffing.

The following 2016 events are examples of Community and Mixed Free Speech events that involve all the attributes listed above and did not pay for police services:

- Hemp Fest (Mixed Free Speech): \$215,553 in SPD wages
- Fremont Solstice Fair (Community): \$50,840 in SPD wages
- Capitol Hill Pride Festival and Rally (Mixed Free Speech): \$45,943 in SPD wages
- University Street Fair (Community): \$38,181 in SPD wages

The Revised Seattle Municipal Code Does Not Specify a Schedule or Criteria for Citywide Event Fee Negotiations

Ordinance 124860 states police fees for Citywide events are subject to negotiation by the chair of the Special Events Committee with the event organizer, in consultation with the Special Events Committee and SPD, and that the agreement must be supported by the Chief of Police and a majority of the Special Events Committee. As a result, police fees for Citywide events are set annually and do not have to meet any specific payment schedule or criteria. As of July 31, 2017, fee negotiations had not been completed for the three 2016 Seafair Citywide events.

SPD dedicates a considerable amount of resources to staffing the six Citywide special events, and cost recovery varies by event, as described in Exhibit 5 below. As of July 31, 2017, cost recovery of SPD wages at all 2016 Citywide events was 3.9 percent overall. Moreover, some Citywide events involve substantial commercial activity, including paid seating, portable ATM's, corporate advertisers, vendor sales, and the sale of alcohol.

Exhibit 5: 2016 Citywide Events: Costs and Fees Charged

In 2016, SPD personnel worked about **18,687** hours on Citywide events, and the total cost of wages was about **\$1.32 million**. For all 2016 Citywide events, cost recovery averaged about 3.9 percent.

Seafair Summer Fourth: As of July 31, 2017, the permit fee was still under negotiation and the police fees for this 2016 event had not been established or billed. Actual police wages and SPD hours worked were **\$525,651** and **6,340**, respectively and **656** SPD personnel were used.

Seafair Hydros Weekend: As of July 31, 2017, the permit fee was still under negotiation and the police fees for this 2016 event had not been established or billed. Actual direct police wages and SPD hours worked were **\$368,762** and **5,725** for this event, and **329** SPD personnel were used.

Seafair Torchlight Parade: As of July 31, 2017, the permit fee was still under negotiation and the police fees for this 2016 event had not been established or billed. Actual direct police wages and SPD hours worked were **\$353,664** and **5,470** for this event, and **694** SPD personnel were used.

Sounders MLS Cup Championship and Rally: This event was charged **\$47,537** for **709** hours of police work. Actual police hours worked, as documented on hard-copy Event Summary Forms provided to us by SPD, were **584**. * In this case, the organizer paid for more police hours than SPD's documentation shows.

Macy's Holiday Parade: This event was charged **\$3,751** for police staffing. Actual police wages and hours worked were **\$31,716** and **457 hours**, and **89** personnel worked this event. Cost recovery for this event was 11.8 percent of SPD wages.

Fremont Solstice Parade: This event was not charged for police services. Actual police wages and hours worked were **\$17,058** and **275 hours** and **50** personnel worked this event. **

* For the 2016 Sounders MLS Cup Championship and Rally, 421 hours were charged to the event in SPD's payroll system, although hard-copy event summary forms provided to us by SPD document 584 hours were worked. In this case, 164 hours of regular time were not charged to the event and are not included in total wage costs for 2016 Citywide events. We discuss this issue further in Section 3.

** This may not account for all the hours worked and wages earned at the 2016 Fremont Solstice Parade. The Fremont Solstice Parade occurred on the same day as the Fremont Solstice Fair, and the same SPD personnel worked at both events. SPD personnel coded **726** hours to the Fair. We believe some of the Fair hours could have been coded to the Parade, or vice versa. The Fremont Solstice Fair is classified as a 'Community' event and does not pay for police services.

Recommendation 5

The City Council and the Special Events Office should (a) review the definitions of Community and Mixed Free Speech events in Seattle Municipal Code (SMC) 15.52 and, given the level of commercial activity at some Community and Mixed Free Speech events, consider whether any updates to these definitions are necessary, and (b) consider establishing criteria and a schedule for setting the fees for police services for Citywide permitted events (e.g., updating SMC 15.52 or developing department policies).

Events with No MOU or Special Event Permit

During our analysis of events that received police services in 2016, we identified several Activity IDs (which is how SPD tracks hours worked to individual special events) with hours worked for which there was neither an MOU for police services nor a special event permit.¹⁶ In some of these cases, it was not clear to us whether an SEO special event permit was required; in other cases, the events appeared to meet the requirements for a permit but did not obtain one. Currently, there is no process at either SPD or SEO to follow up on these events to ensure activities that require police services are charged appropriately.

Below are a few examples of events that received SPD police staffing without an SEO Special Events Permit or MOU:

- A Chief Keef Concert at Neumo's on October 2, 2016 led to \$11,481 in SPD wages.
- A Macklemore Concert on February 26, 2016 led to \$14,354 in SPD wages.
- Maritime and other water events, such as maritime festivals, tug boat races, and holiday events consistently required overtime from SPD officers.

Recommendation 6

The Seattle Police Department (SPD) and the Special Events Office (SEO) should develop a process to address events that require police services but do not obtain either a permit or a memorandum of understanding (MOU) with SPD. The process should vary by type of event (i.e., the process should be different for a free speech event from what it would be for a festival or concert). For upcoming events, the process should include SPD or SEO working with an organizer to help ensure the event has either a permit or an MOU before police services are provided. For events that have already occurred, the process should include follow up from SPD or SEO about City requirements and retroactively billing event organizers for police staffing when appropriate.

Workload Impacts of Ordinance 124860

We were told by multiple SPD and SEO officials that the passage of Ordinance 124860 led to an increase in administrative workload for their departments, and we observed the high volume of work associated with the number of annual events in the City. Although we could not determine how much of the special events workload was a

¹⁶ This does not include Free Speech type events, since these can occur at the last minute and not obtain permits.

direct result of the ordinance revisions and how much resulted simply from the volume of events, we did note the following:

- **Special Events Office (SEO):** The ordinance revisions increased SEO's administrative workload, as the process now includes estimating and billing for police services and an administrative fee based on time, number, and location of street use and quantifying commercial and alcohol service activity. SEO received one additional staff person in response to the increase in workload.
- **SPD's Special Operations Center (SPOC):** SPOC is SPD's primary group for planning and monitoring SPD's staffing for special events, and SPOC personnel told us that the ordinance changes increased their workload "exponentially." SPOC has not received a staffing increase in response to the steady increase in number of events or the new ordinance.
- **SPD's Traffic Unit:** SPD's Traffic Unit dedicates a lot of work time (regular time and overtime) to special events. In 2016, the Traffic Unit spent over \$2.5 million and almost 34,000 hours on special events. Several SPD Traffic Unit officials said that the ordinance revisions increased their administrative workload, due to additional event planning meetings, and yet the unit's staffing was not increased.

Given the reported increase in special events workload that resulted from implementation of the ordinance, both SPD and SEO should consider whether staffing related to special events should be increased.

Recommendation 7

The Seattle Police Department and the Special Events Office should review the administrative workload associated with special events and consider whether they should increase the staffing allocated to these functions.

EVENT PLANNING AND STAFFING

Section Overview

We assessed SPD's processes for determining the number of officers at special events and found that SPD's approach generally reflects many aspects of best practice guidance.¹⁷ However, we also identified key areas for improvement, including more detailed reviews of staffing plans, formal documentation of event planning expectations, and consistent after action evaluations of event staffing levels. We recommend that SPD regularly track event staffing data (by event and event type) and implement an automated workforce scheduling system. Additionally, we recommend the City Council and the Mayor consider amending SMC 11.50.380 to allow non-sworn personnel to override traffic signals so that SPD can use non-sworn personnel to perform more special events work that is primarily a traffic-directing function.

In our review of SPD's practices for staffing special events, we focused on SPD's processes for determining special event staffing levels and controls for minimizing unnecessary staffing costs. We did not assess staffing levels at individual events, and we did not evaluate the policing strategies or tactics SPD employs at special events.

SPD's Event Staffing Level Planning Generally Reflects Federal Best Practice Guidance

Scheduling the appropriate number of officers at special events is essential to ensuring public and officer safety both at the event and throughout the city *and* to ensuring officers are not working unnecessary overtime and events are not overly costly. If an event is understaffed, police at the event may not be able to respond adequately to public safety threats that occur at the event; if the event is overstaffed, the department will have overspent its resources or misdirected staff from other operational priorities.

SPD personnel reported to us that they make decisions about the number of officers necessary for special events on an event-by-event basis, without reference to a staffing model or template. The process followed at SPD is similar to the processes in place at the four police departments we surveyed and is in accordance with the event planning

¹⁷ For best practices criteria, we relied primarily on two documents published by the U.S. Department of Justice: Planning and Managing Security for Major Special Events: Guidelines for Law Enforcement, published in 2007, and Managing Large-Scale Security Events: A Planning Primer for Local Law Enforcement Agencies, published in 2013. We also conducted a literature search for additional online materials and we interviewed Edward Connors (with the non-profit Institute for Law and Justice and the principal author of the 2007 report above). See Appendix C for additional information about our review of best practices and SPD's processes for determining staffing levels at special events.

guidance and best practices we identified. In the federal event planning guidance we reviewed and in our discussions with police event staffing professionals, we did not identify any generic staffing models that police departments should follow to ensure individual events are staffed in the most cost-effective manner. Rather, these resources concurred that special event staffing decisions are based on professional judgment and vary by event and event contingencies.

Nonetheless, best practice guidance indicates that there are certain event attributes or criteria that police departments should assess when determining the staffing level for a special event. Examples of these criteria include prior experience with an event, expected attendance, type of event (e.g., community parade or music festival), event location, starting time and duration, and numerous other elements that vary for each event, such as whether alcohol will be sold, the role of private security, and the cost of admission. Every SPD event planner we spoke with described an approach to setting event staffing levels that included consideration of these types of factors, and we also saw evidence of this consideration in many of the SPD staffing plans and after action reports we reviewed.

Best practice guidance also indicates key steps that police departments should take when planning police services at special events. Some of these include:

- Identification of a lead planner and a core team to oversee major decision making,
- Meetings between police department planners, event organizers, and other key stakeholders (e.g., other departments and affected jurisdictions),
- Assessment of threats and risks throughout planning and right up until the event,
- Planning for worst case scenarios as appropriate (this planning may be very different for a small community parade versus a large festival),
- Identification of all posts, including supervisors and relief officers, the types of skills needed (e.g., Canine, Traffic, SWAT), and the lengths of shifts,
- Structuring event operations similarly to traditional patrol operations, to ensure clear levels of command and to facilitate communication,
- Maintenance of staffing resources for regular patrol operations, and

- Writing after action reports that capture internal and external feedback and document lessons learned.

We compared SPD's processes to those recommended as best practices, and we found that SPD's processes consistently include many of these steps. Areas in which we recommend improvements are described in the following sections.

Independent Review of Staffing Plans and Event Oversight Could be Improved

Until 2016, the event staffing plans created by the precincts and special units (Traffic and Harbor) often received little or no independent review and approval (i.e., review and approval by personnel outside of the precinct or unit chain of command). The staffing costs for these events were charged against SPOC's budget, but SPOC management did not always review the staffing levels for these events.

Since 2016, independent review and oversight of event staffing decisions has increased with the initiation of a weekly meeting between the leadership and personnel of SPOC, the individual SPD precincts, the SPD Traffic and Harbor Units, the Special Events Office (SEO), and SPD Finance. At these meetings, event planners from each precinct, Harbor, and Traffic discuss past and future events that will be staffed by their personnel. They can ask questions of SEO, and they present their general staffing approach, describing how many individuals they plan to schedule by rank. SPOC leadership can also ask questions about the planned staffing level for an upcoming event or whether staffing for a past event was appropriate. For upcoming events that are discussed, the SPOC Captain or Assistant Chief can suggest a revision to a staffing plan or give verbal approval of the proposed staffing level.

The weekly SPOC meetings have increased independent review and oversight of event staffing decisions throughout the department, but there are still gaps that must be addressed.

- **Written plans are not reviewed and discussion is limited to number of personnel anticipated:** Events are often discussed at the SPOC meeting before a formal staffing plan has been drafted, and so planners present only the number of officers and supervisors they anticipate scheduling. For example, at the meetings we attended, discussion did not include roll call times or end times or the number of squads or shifts to be scheduled. Because officers can work varying length shifts and work in vastly different squad sizes, the total number of individuals only tells you one aspect of the staffing level, and the associated cost, for an event.
- **Approval of staffing plans is not consistently documented:** SPOC management's approval of staffing plans at the

meetings is verbal, and, as described above, does not include review of the actual documented event staffing plan. Further, we saw very few staffing plans that included documented review or approval from either SPOC or precinct management.

- **Some events are discussed six to nine months before they occur:** Events are put on the SPOC meeting agenda when SEO receives a permit application, and this could be six or more months before the event will occur. A key aspect of event planning involves assessing risks and updating plans as needed if risks change. For this reason, it would make sense for SPOC to ensure events are discussed again no more than a couple of months before the event is scheduled to occur.
- **Not all events are discussed:** Most events on the Seattle Center grounds are not discussed at the SPOC meetings.

To ensure all event staffing decisions receive sufficient independent review, SPD needs to clarify the goals of the weekly SPOC meetings and ensure all event plans are adequately reviewed in the immediate months preceding an event. Further, discussion of events at the weekly SPOC meetings should be expanded to include more details about the staffing plan, discussion should accompany review of draft plans that include schedule and shift details, and approval of plans should consistently be documented in writing.

Systematic Reviews of Events Hours or Costs is Needed

SPD personnel reported to us that currently there is no regular systematic tracking of event hours or costs by event or event type, and no one compares the reviewed staffing plan with the actual hours spent working an event. Tracking and analyzing event hours and costs would allow SPD to detect staffing and cost trends, identify events that require more staff than others of the same type, and model how adjustments to staffing (e.g., using more Parking Enforcement Officers or volunteers or requiring moving events, such as parades, to use an alternative route) could achieve efficiencies and impact costs. Comparing planned with actual staffing would allow SPD to identify gaps in the current review process, document issues with scheduling and staff availability, and assess how staffing plans change from one year to the next. SPD Fiscal reported to us that they attempted to compare estimated to actual hours for 2015 events and found that in some cases actuals significantly exceeded estimates.

Incentives to Overstaff and Potential Conflicts of Interest

One key reason independent review and oversight is necessary is that, as SPD personnel explained to us, there can be incentives to having more staff than may be necessary at events. This is because SPD planners want to err on the side of caution to minimize risks to the public and officer safety, and because it can be difficult (and in some cases impossible) to increase event staffing quickly if needed. Independent review of event plans can help ensure SPD event planners are consistent in how they weigh and plan for risk.

Independent review is also necessary to mitigate the conflict of interest created when the same individual creates event staffing plans and works event overtime. This arrangement is common at SPD, and at the other police departments we surveyed, because the individual planning the event is often the most knowledgeable about the event details and SPD's plan of operations for the event. However, the arrangement also presents the risk that individuals could intentionally increase the staffing levels at events to increase the overtime available for themselves or their colleagues. This risk is exacerbated when there isn't sufficient independent review of staffing plans or event-related overtime documents.

For example, Seattle Center events are staffed and often worked by the same sergeant in the West Precinct, and this supervisor also often signs the Event Summary Forms (which track the hours worked by individual officers at events) for these events. Most Seattle Center events are not discussed at the SPOC meetings, and so there is no independent review of these staffing plans before the events. This means that the same individual plans the event, schedules staff for the event, works the event, and approves the overtime forms for the event with no additional layer of management review.

Additional Process Improvements Are Needed

Additional areas in which SPD could improve their processes for determining staffing levels include the following:

- **Development of Scalable Plans:** A recommended practice in planning for large events is the development of scalable plans that specify how staffing can be adjusted up or down as intelligence is updated for an event. Some of the SPD event plans we reviewed specified how staffing could be increased if needed, but none of the plans specified how staffing could be reduced either before or during the event (although one after action report described how staffing was reduced during the event when attendance was lower than anticipated). Although the Collective Bargaining Agreement for SPD's officers specifies that officers must receive 3 hours of overtime pay if their overtime shift is cancelled less than 72 hours before the

event, SPD could still achieve cost savings by sending officers home from events as soon as they are no longer needed, and formal planning should include this contingency.

One reason scalable plans are important is because it can be difficult to estimate the attendance of an event. Several SPOC officers and other sworn SPD personnel reported to us that attendance forecasting is complicated and can be inaccurate. For example, SPD personnel reported to us that in 2016, staffing for the Torchlight Parade was higher than necessary because attendance ended up being substantially lower than expected.¹⁸ In addition, at a November 2016 Black Lives Matter protest attended by one of our auditors, attendance was expected by SPD to be around 2,000 but was closer to 200.

- **After Action Reports:** A key recommended best practice is the writing of after action reports to document whether event staffing was sufficient and appropriate, in addition to documenting other lessons learned from the event. All the SPD event planners we met with emphasized the importance of experience with previous events when planning staffing for an upcoming event. However, during our file review of 68 events, SPD could locate only 12 after action reports. SPD event planners explained to us that, although after action reports can be valuable sources of information about event operations and staffing, they generally complete formal reports only when requested by SPD management or when there was a major issue at an event.

During our audit, SPD developed a new Special Event After Action Form designed to capture event staffing information for all special events. The form requires event personnel to document and evaluate event staffing, and it also asks for staffing suggestions for future similar events. This improvement, once fully implemented, will increase the consistency of information tracked about the adequacy and appropriateness of event staffing levels and will facilitate future event planning and analysis of staffing levels. SPD should continue implementing the new form and ensure guidance about its use is documented in the department's policies and procedures, including who is responsible for completing the form, how event input is to be solicited, and when forms are due.

¹⁸ In 2016, SPD used 694 people, 5,470 hours, and \$353,664 in wages to police the Torchlight Parade; in 2015 SPD used 598 people, 4,897 hours, and \$340,129 in wages.

- **External Feedback:** Only one of the after action reports we reviewed discussed getting feedback from the event organizer. Feedback from organizers could provide useful information to SPD planners about staffing levels and other aspects of event operations. SPD should also incorporate after action information from other entities involved with an event when possible. For example, the Special Event Committee (SEC) has a process of capturing after-event information about permitted events in its regular meeting minutes, and these notes include comments from the multiple entities that are involved with events. SPD should work with the SEC to solicit this information and include it in SPD's after action reports as appropriate.

Event Planning Documentation is Inconsistent

In our review of SPD's staffing plans, we saw a wide range in how staffing plans were documented and how much detail they included. For example, one precinct event planner created an Incident Action Plan for every event, another often created only a staff roster, and another could not provide any documentation of staffing plans for the prior year.

Additionally, the details included in Incident Action Plans themselves varied widely—we reviewed Incident Action Plans that included little more than a staff roster, while others were comprehensive event plans with event details and communication plans, among other information. Moreover, although SPOC is supposed to be the central repository for all staffing plans, we had to work with event planners throughout SPD to locate the staffing plans in our sample that were not created by SPOC (e.g., for precinct- or Traffic-planned events).

Policies and Procedures Need to Document Event Planning Expectations and After Action Requirements

Since 2016, SPD has been working to improve the oversight of event staffing decisions (e.g., through SPOC's reviews of staffing plans) and the consistency of event planning documentation (e.g., after action reports). These are excellent first steps, but they were recently implemented, are still evolving, and have not been formally documented in policies and procedures.

Section 14.100 of SPD's Department Manual covers special event planning. Although this document lists responsibilities for the various elements of planning special events, it does not specify how staffing decisions are to be made (e.g., what criteria must be evaluated) or how staffing plans should be documented. The manual also does not discuss when plans require review and approval or how approval should be documented, and it does not specify which unit in SPD is responsible

for oversight of event staffing decisions or how this oversight should be implemented. For example, the manual does not describe the weekly SPOC meetings, the objectives or role of the meetings, and who has authority (and responsibility) to approve event staffing plans.

The manual also does not address the key elements staffing plans should include, such as specific steps for providing relief to scheduled officers or guidance on whether to schedule on duty resources or officers on overtime. Some event planners told us that they always try to use on duty resources to minimize overtime costs, while others schedule overtime because patrol is already understaffed. SPD should clarify the department's priorities and provide guidance to event planners.

Section 14.010 of SPD's Department Manual discusses after action reports. As we describe above, after action reports are a recommended practice in event planning, and SPD personnel reported to us that, as of mid-2017, completion of a new Special Event After Action Form is required after all special events. However, SPD's manual section on after action reports does not yet reflect this requirement.

Recommendation 8

SPD needs to improve oversight of event staffing plans decisions by ensuring:

- a. Independent reviews of event staffing include schedule and shift details,
- b. All event plans are independently reviewed, including those for events at the Seattle Center, and
- c. Plans are reviewed, or updated, in the months immediately preceding an event.

In addition, SPD needs to ensure Special Event After Action Forms are completed for all special events, in accordance with the practice implemented in early 2017.

Recommendation 9

SPD needs to update its policies and procedures that address Special Event Planning and After Action Reports. Policies and procedures should specify:

- a. How staffing decisions are to be made (e.g., what criteria must be evaluated) and how plans should be documented.
- b. When plans require formal independent review and approval, who is responsible for this review, and how this approval is to be documented.

- c. The goals of the weekly SPOC meetings and SPOC's oversight responsibility for event staffing decisions and planning, including what this oversight should include.
- d. How after action information for special events should be documented and archived for future use (i.e., describe requirements for SPD's new Special Event After Action Form).

In addition, SPD's policies and procedures should ensure that:

- e. Staffing plans include options for releasing officers early if resource needs decrease during an event.
- f. Staffing levels are assessed, and these assessments should be documented, after all special events. These assessments should include feedback from external parties (e.g., event organizers and Special Event Committee members) when feasible.

Once updated, SPD should ensure compliance with policies and procedures related to special events.

Recommendation 10

SPD should begin regular tracking of event staffing information, including trends in event hours and costs by event and event type and perform comparisons between estimated (or planned) staffing with actual staffing at events.

Manual Methods Are Used to Schedule and Draft Event Personnel

As discussed in the Special Event Staffing Analysis appendix (Appendix C), SPOC prepares the staffing plans and schedules the officers for large or complex events and assists with scheduling officers for many smaller special events. Large events usually require SPD to draft personnel to work, because there are often not enough volunteers to staff the City's largest festivals, parades, or protests (e.g., July 4 events). SPD tries not to draft Patrol officers to avoid reducing staffing for regular police work (e.g., so that enough officers are available to respond to 911 calls), and the order in which officers from Patrol watches¹⁹ must be drafted is specified in the Collective Bargaining Agreement (CBA). The pool of personnel available to draft can be quite small after eliminating Patrol by watch per CBA rules, the personnel who are not available for draft due to their job function, and management approved draft exemptions. SPOC estimates the draft

¹⁹ A Patrol watch is a work shift for a sworn Patrol officer (e.g., 2 p.m. to 11 p.m.).

pool consists of about 130 non-Patrol personnel (mainly detectives and Training officers).

SPD does not have an automated workforce scheduling system to assist with this drafting effort. Instead, SPOC must rely on daily faxed schedules for the 15 different Patrol shifts (3 per precinct) and from the other SPD sections and on manual reviews of SPD personnel information. Even with these manual methods, SPOC still does not have complete visibility over who is working each shift on a given day due to schedule changes not being updated²⁰ and exemptions²¹ that aren't centrally tracked. The lack of an automated workforce scheduling system makes it difficult for SPOC to know who is truly available to work (i.e., isn't on leave or on limited duty), who is eligible for the assignment, and who has the necessary skills and training. Other factors that must be considered are staffing selection equity and whether an officer has already exceeded SPD's maximum work hour thresholds or has already been scheduled to work too many hours without a break. Without an electronic workforce scheduling system, SPOC staff are using manual processes to schedule staff for large upcoming events and to identify who is available to respond to an immediate emergency or a non-permitted protest. This process is both time consuming and at risk of errors, which we describe below.

Other jurisdictions use workforce scheduling and timekeeping systems (i.e., Telestaff and KRONOS) and resource allocation systems. Several officials from these jurisdictions stated that these systems work well and create efficiencies in event planning. We received this feedback from six other police departments we surveyed during our 2016 audit of SPD's Overtime Controls.²² In addition, a former SPOC official who used workforce scheduling tools while working for the City of Tucson Police Department confirmed their effectiveness. Without such a system, SPD must continue relying on inefficient manual scheduling methods.

There are additional issues with SPOC's manual staff scheduling and personnel drafting processes:

- **Exemptions** – We were told by SPOC officials that exemptions from special events make the draft process difficult, as they reduce the number of officers who can be drafted. Further, captains have a lot of leeway to grant exemptions to their staff, and there is no accurate central list of current exemptions that SPOC can refer to. As a result, it is

²⁰ According to SPOC, there is about a 20% error rate with the accuracy of personnel shift codes.

²¹ An exemption is permission granted by management for a staff member to not be available for a draft assignment.

²² http://www.seattle.gov/Documents/Departments/CityAuditor/auditreports/PublishedReport-Corrected-04_22_16.pdf

difficult for SPOC to successfully draft a specific number of officers. For example, SPOC said they drafted 30 more people than they estimated they would need for the 2016 Pride Parade, but ended up 10 short, partly due to exemptions that SPOC was not aware of (and also due to No Shows, which are discussed below). For this event, SPOC had to use on-duty Patrol personnel to make up for the shortfall.

- **Sworn Staff Doing Administrative Work** – Currently, SPOC uses sworn personnel to perform most of the special event staff scheduling functions. SPOC officials said that without a workforce scheduling system in place, a sworn police officer is needed to execute these functions. However, if SPD implemented an automated technology solution, sworn staff could establish the rules and protocols for the system and civilian staff could then execute the administrative tasks of scheduling personnel and obtaining other resources needed for events.

Recommendation 11

SPD should pursue a technology solution, such as a workforce scheduling system, to improve the effectiveness and efficiency of event staffing functions. Then, SPD should re-evaluate all event planning tasks to determine what could be done by civilians and what must be done by sworn staff.

No Show and Sick Call Ins Affect Event Staffing

When a draft is required to staff a special event, SPOC needs to draft enough personnel to account for potential “No Shows” and “Sick Call Ins.” A No Show is someone who does not show up or provide notice they won’t make it to the event, and a Sick Call In is a person drafted to work who calls in sick the day of the event. SPOC officials said they generally overdraft by 5 to 15 percent to account for personnel who don’t show up or call in sick for an event.

We noted several issues regarding No Shows and Sick Call Ins for special events work:

- **No Policies and Procedures** - There are no SPD policies and procedures addressing how No Shows and Sick Call Ins should be handled for special events drafts (e.g., how much to overdraft).
- **Lack of Consequences** – According to some SPD officials, there are no consequences for No Shows and Sick Call Ins, even for repeat occurrences. However, other SPD officials told

us that if people don't show up for an event without notice, their name is turned in to the Office of Professional Accountability (OPA) for investigation. The former Director of OPA told us that OPA has not received any No Show reports that he can remember.

- **Lack of Tracking** – We were told by a SPOC official that SPOC tracks No Shows. However, when we reviewed this tracking in December 2016, there were only ten names listed for all of 2015 and one name listed for 2016. So, either the No Show tracking did not occur consistently in 2015 and 2016, or people were calling in sick instead. The OPA Director said people call in sick at the last minute and there is nothing that can be done due to SPD's sick leave policy. An SPD official stated that the department is now tracking No Shows and Sick Call Ins for draft events.
- **Call in Sick and Get Paid Sick Leave** – SPD officials told us personnel drafted for special events can call in sick the day of the event and get paid for sick leave if it is their normally scheduled day off. In other words, an officer can get paid for sick leave on a regularly scheduled day off if they call in right before the event.
- **Problems for Post-Oriented Work (Traffic)** – SPD Traffic officials said No Shows are a big problem for events like parades and marathons, because there are fixed posts (e.g., intersections) that must be covered with a certain number of people. For example, in 2016, there were eight posts for the Pride Parade that could not be covered due to absences so SPD had to spread out available personnel to compensate for this.
- **Lack of Prior Year Data** – SPD event planners do not have data on the number of staff absences from the prior year for the events, which could help with planning the current event. This information could be tracked in the after action reports discussed in Recommendation 8.

Recommendation 12

SPD should improve tracking of personnel absences for special event drafts and should review and reconsider the department's policies for No Show's and when employees call in sick the day of an event.

Use of Sworn Personnel to Direct Traffic at Special Events

A substantial amount of SPD sworn officers' hours at special events is spent on traffic-directing functions. For example, the following categories of events primarily involve traffic-directing functions. In 2016:

- Professional Sports and University of Washington Stadium events used sworn officers for **36,691** hours and paid them **\$2,662,383** in wages.
- Athletic events used sworn officers for **5,841** hours and paid them **\$432,696** in wages.
- Seattle Center Garage and Traffic Detail used sworn officers for **918** hours and paid them **\$66,540** in wages.

For the above categories, wages to sworn personnel totaled about **\$3.2 million** for over **43,000 hours** of work in 2016.

We recognize that SPD personnel are responsible for ensuring public safety at the same time they are performing special events traffic directing functions. However, given the number of hours sworn personnel spend on traffic-centric events, and the cost of using them to provide these services (to both event organizers and the City), SPD, the City Council, and the Mayor should explore options for using non-sworn personnel for some of this work. For example, San Diego uses non-sworn part-time hourly employees, known as Special Event Traffic Controllers (SETC's), to provide traffic directing services at special events. SETCs are authorized by ordinance to direct traffic on San Diego city streets and cost about one-third of the cost of a sworn officer. Many events are staffed primarily with SETCs. For example, marathons are staffed with about 90% SETC's and 10% sworn personnel.

It should be noted that doing this in Seattle would require a change to Seattle Municipal Code (SMC) 11.50.380, as only sworn personnel are currently allowed to override a traffic signal.



2016 Seattle Rock and Roll Marathon. Source: Office of City Auditor

Recommendation 13 The City Council and the Mayor should evaluate the special events work SPD officers perform that is primarily a traffic-directing function and consider whether it could be handled by non-sworn personnel. We recognize this would require revising Seattle Municipal Code 11.50.380 covering the authority to override traffic signals.

SPECIAL EVENT ADMINISTRATIVE FUNCTIONS

Section Overview

In this section, we describe the results of our assessment of controls over key special event administrative functions, including billing and payment processes at SPD (for reimbursable events) and SEO (for permitted events), SEO's processes for administering the Special Event Permit process, event tracking by SPD and SEO, and SPD payroll coding and approvals for special events work. We also discuss the need for event-level reporting that identifies the cost impact of SPD officers working at special events (i.e., presents the direct costs incurred by SPD and any fees or reimbursements paid by the event organizer for SPD's services).

Reimbursable Event Administrative Functions

Reconciliation of Planned to Actual Hours Could Improve Billing Accuracy

The SPD Fiscal Accounts Receivable (AR) Accountant creates monthly invoices for police services for the reimbursable events in the City's Summit AR system. Invoices are based on queries of SPD's payroll system for police hours worked by event activity ID. The manager of SPD's Fiscal section reviews invoices before they are mailed to the customers along with the supporting details. The manager relies on the accuracy of the payroll system data and does not reconcile or compare planned police hours for special events to hours recorded in the payroll system.

Without reconciling hours planned for an event with the hours that were ultimately coded to the event, there is the risk that SPD Fiscal will not identify a coding issue that could affect billing accuracy. If special event hours are not properly coded to the event-specific activity ID, billing based on these hours will be inaccurate, and SPD Fiscal would not be able to identify this issue without a reconciliation to planned hours. This risk is higher given the issues noted below under Special Event Payroll Time Coding, particularly related to whether regular time worked by SPD personnel for events is accurately coded and billed.

Recommendation 14

SPD Fiscal should periodically compare planned reimbursable event police hours and expenses to actual hours to help ensure all hours are properly billed to the event organizers.

Permitting Administrative Functions

Manual Distribution of Permit Applications

Event organizers submit their Special Event Permit Application forms and supporting documents to the Special Events Office (SEO), which reviews and then forwards them to the Special Events (SE) Committee members to review. Permit applications are then discussed at the monthly SE Committee meetings, where representatives from the various departments, including SPD, can raise any concerns. SEO's current process to distribute permit applications to SE committee members is manual and inefficient, because each permit document package must be emailed to committee members separately. It is not uncommon for SEO to send over 20 permit packages in a month, especially before the busiest summertime special events months. The use of technology, such as a Customer Relations Management (CRM) system, would eliminate the need to send emails, centralize events recordkeeping, and improve efficiency.

Event Numbering and Tracking

SPD and SEO track the same special events with different event numbers. As a result, there can potentially be several different tracking numbers for the same event used by the departments involved with special events. This causes confusion and inefficiencies, as it is difficult to track a single event in multiple systems or over several years. The use of a technology solution, such as a CRM system, could eliminate this duplication of effort. Further, the implementation of a standardized event numbering scheme could simplify event tracking between departments and facilitate tracking the same event (or similar events) over time.

Recommendation 15

The Office of Economic Development and the Seattle Police Department should consider investing in a Customer Relationship Management System (CRM) to improve the efficiency of the special events permit application review and event tracking functions. This system should facilitate tracking each event with a unique identifier and event numbering scheme that facilitates tracking the same event (or similar events) over time.

Billing and Payment Processing

The SEO Permit Admin prepares the permit fee invoices, which include the fees for police services. The invoicing process is manual and time consuming and each fee is itemized on the invoice. The Permit Specialist enters the permit fee information into the SPECTRE²³ database, posts the payments to the database, and reviews and reconciles customer account balances. At the time of our audit fieldwork, SEO staff told us that there was management review of invoicing and payments only occasionally or if there were issues with an account. Since that time, SEO management reported they have instituted management review of most customer invoices that include police fees.

SEO staff reported to us that most permit customers mail their permit fees to SEO or call in with a credit card but a few pay in person in cash or check at the SEO office. The Special Events Permit Admin usually posts the payments, creates a STORM²⁴ cash receipt document, and another individual delivers the payments to the Department of Finance and Administrative Services' Treasury unit for deposit. At the time of our audit fieldwork, we were told there was no regular and independent (i.e., performed by someone other than the staff who update SPECTRE) reconciliation of the SPECTRE database invoice and payment information to the deposits posted to STORM and Summit. Since that time, SEO management reported they have implemented a monthly reconciliation of SPECTRE to Summit.

We have the following concerns about the permit billing and payment processing functions:

- **Segregation of Duties and Lack of Independent Management Review** – There is a lack of proper segregation of duties if the same person can prepare invoices, update invoice and payment data to the customer records, open and process customer payments, occasionally receive customer payments, and review customer accounts. In addition, a regular (i.e., monthly) independent review and reconciliation (i.e., performed by someone other than staff who update the SPECTRE database) of customer account invoice and payment information in SPECTRE to FAS deposit records or Summit account balances is important to identify any potential issues. These internal controls help prevent the risk of errors, undetected theft of payments, or customer “kickbacks” paid to staff in exchange for a bill reduction. At the time of our audit fieldwork, we were told these control steps were not regularly occurring. Since that time, SEO

²³ SPECTRE is the special event permit database maintained by the Special Events Office.

²⁴ STORM is the City of Seattle's cash receipting system.

management reported to us they have implemented improved controls over invoice review and monthly reconciliation of SPECTRE to Summit. SEO's control procedures should be documented and there should be evidence of management invoice approvals (i.e., a signature) and independent reconciliation of the database to Summit.

- **Cash Payments at SEO** – The practice of accepting cash or check payments at SEO, especially in light of the need for improved segregation of duties controls described above, presents the risk of undetected thefts of payments.
- **Lack of Actual Hours True Up** - There should be a comparison of actual police hours worked to what was estimated and invoiced, and customers should be refunded or billed for any difference. Currently, ordinance 124860 addresses this in regards to refunds but does not address billing for additional hours. In contrast to Seattle's practice of billing event organizers for police services before the event, Portland, Denver, San Diego, and San Francisco bill the organizer after the event, though they provide an estimate of the fees in advance.
- **Late Payments or No Payment Without Penalties** – We reviewed invoices and payments for 33 permitted events and found that 23 organizers (about 70%) paid after the required 30-day pre-event time frame. No penalties, such as interest fees or late charges, were assessed to these delinquent customers. For example, in 2016, the Rock and Roll Marathon paid two months after the event. SEO indicated this was due to the new billing process implemented in 2016 and that many invoices were not issued to the event organizers until just before 30 days before the events, or when they were supposed to be paid.
- **Inefficient Invoicing Process** – SEO could improve permit fee invoicing efficiency with a technology solution (e.g., a CRM system) that has features such as increased automation and populated fields for billing.

Recommendation 16 SEO should update their policies and procedures to ensure permit fee billing and payment handling procedures include an adequate level of segregation of duties. A staff member or manager who does not process payments should reconcile SPECTRE to Summit monthly.

- Recommendation 17** SEO should improve its enforcement of the requirement to pay special event permit fees 30 days before the event. SEO should follow the City's standard policy for handling delinquent debt and assessing late fees or interest charges for delinquent police services debts.

Permitted and Reimbursable Events Administration

Special Event Payroll Coding for Time Worked

We reviewed coding of special event time in the SPD payroll system during our data analysis work (see details in Appendix A) and discussed this topic during audit interviews with SPD officials. We identified the following concerns:

- **Regular Time Worked for Events** - SPD policy 4.020 Reporting and Recording Overtime/Out of Classification Pay, item 9, covers how to record special event time (overtime and regular time), but does not specify that all event time (including regular time) must be coded to the event activity. We were told by SPD officials in multiple units that personnel sometimes record regular time worked for events to the code for regular work, instead of to the event code. For example, we determined that only 72 percent of total hours worked at the Sounders MLS Cup Championship and Rally event were accurately coded to the event. Consequently, it's impossible for SPD to use its payroll data to get an accurate count of hours worked for special events or for a specific event. This results in under-accounting of actual hours worked and wages paid for events and leads to SPD underbilling reimbursable events for police services.
- **Multiple Events Held on Same Day and Location** - When there are multiple special events on the same day and in the same vicinity – e.g., the day after Thanksgiving when four permitted events take place in the downtown core – the same SPD personnel often work more than one event and their payroll time is often not coded properly to each individual event. We saw evidence of this during our audit test work. Consequently, the event time tracking is not accurate.
- **Large Seattle Center Events** - The three large Seattle Center festivals have different police services arrangements for different functions. The main Bumbershoot and Bite of Seattle festival events obtain police staffing through separate MOUs

with SPD and some of the festival-related functions (e.g., Folklife Money Room, Bite of Seattle Street Use) obtain police staffing through a special events permit.²⁵ SPD time should be tracked to the proper activity ID to help ensure proper time tracking and billing for the reimbursable events. We found this was not occurring for these events.

- **Single Code Used for Multiple Events** - There are some Activity IDs that are used to charge hours for multiple, similar events under one Activity ID; thus, hours are not trackable for the individual events that charge to these Activity IDs.

Timekeeping Administration and Payroll Processing

We identified the following concerns with timekeeping administration and payroll processing functions for special events time:

- **Policies and Procedures for Documentation of Time Worked**- There are no documented policies and procedures covering how to complete Event Summary forms (ESFs), which are the supporting documents for SPD time worked for special events. Policies and procedures should specify how to complete the ESF's, the approvals required, where to submit them (i.e., SPOC, SPD Payroll, etc.), and record retention requirements. During our audit work, we found issues with:
 - **Employee Signatures** – Some ESFs were not signed by the employees working the events.
 - **Management Approvals** - Several ESFs were only approved by a sergeant who also worked the event, and this represents a conflict of interest or at least the appearance of one.
 - **Central Records Retention** – ESFs are supposed to be sent to SPOC for review and approval, and then to SPD Payroll for entry. Payroll indicated they do not always get the ESFs and our audit test work confirmed that SPOC also doesn't receive all of them. Specifically, SPOC does not get all Traffic ESFs and does not get them from some precincts. Our 2016 audit of SPD overtime controls included a recommendation that SPD establish a central repository for overtime supporting documents. During our fieldwork on this audit of special events staffing, we observed that SPD still does not have a central repository for all

²⁵ There is no MOU for the Folklife festival event but SPD services are provided.

supporting documents for special event time, though SPOC is supposed to be that repository.

- **Event Time Entry to Payroll System** – According to SPD Payroll, special event time should not be entered by SPD sections or precincts. However, SPD precincts and sections sometimes enter their event time. The SPD Payroll Supervisor said some detectives enter their own event time directly on their own timesheets, which is not appropriate. Special event time is supposed to be entered by SPD Payroll staff.

Recommendation 18 SPD should update and enforce its special event payroll policies and procedures, including those addressing payroll time coding, management approvals, and timekeeping functions. SPD should implement controls to ensure:

- a. regular time worked for special events is coded to the event
- b. time is coded to the accurate event code, including time for
 - i. multiple events held on the same day
 - ii. large Seattle Center events/festivals
- c. special event time is entered only by SPD Payroll staff

Event Reporting and Accounting for Revenues and Expenses

SPD Finance produces monthly reports on overtime usage that includes special events as a category. However, SPD does not produce reports at the event-level that highlight:

- Total hours worked (including overtime and regular time)
- Total wages paid
- Total number of staff or number of shifts worked
- Above information for prior year or recent years

We were told by the SPD Assistant Chief over special events at the time of our audit fieldwork that he only received event-level reports if the event involved a draft of SPD personnel or he specifically requests the report. We were also told by several officials in SPD, Seattle Center, and SEO that these reports would be useful to assist with management decision-making. Seattle Center specifically would like to receive reports on all Seattle Center events, those that receive police staffing through the Seattle Center MOU and those that are billed directly to the organizer based on separate MOU's.

Currently, SPD generates reports that match revenues from reimbursable events against wage costs; however, the reports do not factor in the additional direct costs that are discussed earlier in this report. Police fees for permitted events are not matched against expenses or even reported to SPD. The relationship of the costs of staffing events to the fees received could be important to decision makers. Reports should be produced that compare event revenues (i.e., police fees for permitted events and payments for reimbursable events) to event expenses (i.e., SPD wages for working events, related benefits, equipment operations and maintenance expenses [e.g., vehicles or motorcycles], and other direct expenses such as food and transportation), so that City decision makers can see this relationship.

Recommendation 19

Event-level reporting should be produced regularly by SPD and distributed to key special events decision makers in SPD, SEO, Seattle Center, and the City Budget Office. This reporting should match police fee revenues to police event expenses because the relationship of the costs of staffing events to the fees received could affect decisions about managing costs. Reports should include hours worked (including overtime and regular time), wages paid, number of staff or shifts worked, and comparative information from prior years.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

Because this audit was required by Ordinance 124860, we developed our audit objectives to address the requirements outlined in the ordinance related to SPD's staffing of permitted special events. This included reviewing SPD's planning, authorization, staffing levels, attendance, and payment of officers for permitted special events. We also included special events that are not permitted and receive police services based on a contract or a Memorandum of Understanding (MOU) with SPD (i.e., reimbursable events). We included these types of special events within our audit scope because the police staffing activities are similar and related to those for the permitted events. The primary objectives of this audit were to:

1. **Special Events Ordinance Revisions and Other Policy Considerations:** Determine how the ordinance revisions affected special events police services, including events governance, police fees, and cost recovery of police expenses. Review policies related to special events police services.
2. **Special Events Police Fees and Cost Recovery:** Review the City's fee structures for the different types of special events and determine whether permitted events are categorized appropriately. Determine the City's level of cost recovery for police services expenses for permitted and reimbursable special events and compare to other cities.
3. **SPD Event Planning and Staffing:** Determine whether SPD has: implemented sufficient management controls to ensure police staffing levels for special events have been adequately planned, reviewed, and approved; adequately addressed risk management (i.e., public and officer safety); and conformed to best practices guidance.
4. **Special Events Police Services Administrative Functions:** Determine whether SPD's internal controls ensure special event hours are tracked, processed, recorded, and paid accurately. Determine whether SPD's and the Special Events Office (SEO) internal controls ensure police fees are calculated and billed accurately, payments are processed accurately and appropriately, and any delinquent accounts are handled

properly. Determine whether SPD adequately tracks and reports special events time and expenses.

Scope

We reviewed current and recent SPD and SEO policies, procedures, and practices for special events police services, with a greater focus on current operations. However, we did not review SPD's tactics for policing special events. For our data analysis work, we reviewed payroll and special event permit records for 2010 through 2016, and analyzed special events trends and statistics, as required by the ordinance. We reviewed SPD and SEO documents from 2015 and 2016 for our audit test work.

We conducted an audit of internal controls for special events police staffing functions. We evaluated whether there were adequate controls in place, whether there was compliance with controls, and whether management was properly monitoring special event police staffing controls and following up on any issues. The basic categories of controls we included within our audit were:

Special Events Ordinance Revisions and Other Policies:

- Police fee policies for event categories
- Permitting governance
- Categorization of permitted events
- Method of obtaining event police services – permit or MOU
- Use of sworn personnel for special events work

Police Fees and Cost Recovery:

- Methodologies for determining police fees
- Cost recovery of police expenses

Event Planning and Staffing:

- Staffing levels
- Staffing plans
- Obtaining staffing resources
- Management monitoring
- Staffing attendance – No Shows and Sick Call Ins

Special Events Administrative Functions:

- Policies and procedures
- Permit application and review

- Event tracking
- Tracking SPD time worked
- Timekeeping and payroll processing
- Contract/MOU agreements for reimbursable events
- Police fees billing, payment processing, and delinquent accounts
- Special event reporting
- Accounting for police fee revenues and expenses

Methodology

We based our conclusions on several types of audit work, including reviews of documents, observations, audit test work, data analysis, and benchmarking. Specifically, we:

- Interviewed SPD, SEO, Seattle Center and other City officials, including sworn commanders/management of fourteen SPD sections. In total, we interviewed 31 SPD officials;²⁶
- Reviewed special events policies and procedures, reports, and other documentation (e.g., collective bargaining agreements);
- Observed the Seattle Police Operations Center's (SPOC) process for creating an event staffing plan (i.e., Incident Action Plan [IAP]);
- Observed SEO's processing of a special events permit, including creating the invoice and processing the payment;
- Attended two Special Events Committee Meetings and five weekly SPD event planning meetings;
- Attended five special events to observe police operations;
- Conducted a review of police event staffing best practices;
- Analyzed and summarized payroll data on special events time worked from 2010 through 2016 (see Appendix A);
- Conducted audit test work by reviewing:
 - A judgmental sample of staffing plans and supporting documentation for 68 events,

²⁶ We interviewed SPD management from Budget and Finance, Fiscal, Payroll, Contracts, Traffic (including the Parking Enforcement unit), Education and Training, Special Operations Center (SPOC), Harbor, Southwest Precinct, East Precinct, North Precinct, South Precinct, West Precinct, and Audit and Policy.

- A sample of 33 special event permits, supporting invoices, payment receipts, and event summary forms, and
- A sample of 15 reimbursable event MOU's, invoices, and payment receipts,
- Conducted cost recovery analysis on 13 events comparing actual wage costs from SPD payroll data to invoiced amounts; and
- Surveyed four cities to learn about their policies and procedures for staffing special events police work and cost recovery. We surveyed: Portland, Oregon; Denver; San Diego; and San Francisco. See Appendix E for the results of our survey work.

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.

We used the judgmental method to determine our samples selected for our audit test work. The results of our audit test work cannot be projected to the population of all special events staffed by SPD, as we did not select a random sample. Rather, we designed our sample to ensure we included different types of events planned by different SPD entities.

APPENDIX A

Seattle Police Department (SPD) Payroll Data Analysis and Conclusions

Scope and Methodology

The data we used spanned January 1, 2010 through December 31, 2016. We used ACL, Excel, and Tableau software to perform our data analysis.

We accessed SPD payroll data from two sources: 1) the Department of Finance and Administration Services' extracts of payroll data from the Human Resources Information System (HRIS), and 2) SPD.

Payroll data from HRIS are "raw" (i.e., the data have not been subject to any review or processing by a human). We used ACL to analyze these data and encountered many questions related to coding anomalies, and worked closely with SPD to resolve our questions and clean the data. We eventually decided to use SPD's "refined payroll data" that had already been analyzed and cleaned. After each pay period, staff in SPD's Budget and Finance unit work with staff in SPD Payroll to research and resolve questions about coding and whether hours were charged correctly.

SPD's refined payroll data are the data SPD uses to report on its overtime use. SPD has an Overtime Analyst in its Budget and Finance Unit, who downloads the Time and Labor data from HRIS after each payroll period, performs queries, and checks and makes corrections and adjustments for coding and timekeeping entries; this is referred to as SPD's refined payroll data. These data contain all department overtime and compensatory time (comp time), and all hours (regular, overtime, and comp time) related to special events. Because SPD corrected coding and timekeeping errors that it identified, we chose to use these data for this audit.

We analyzed the 2010-2016 refined data and removed all Activity IDs²⁷ not associated with special events (e.g., training, criminal investigations, DOJ Response, In-Car Video, etc.). For Activity IDs associated with special events, we categorized the data into 16 event categories, as described in the next section on Event Categorization Methodology. We performed data analysis on the 16 events categories, and more detailed analysis within some categories, as is further discussed in this appendix.

Event Categorization Methodology

We categorized Activity IDs into 16 event categories. This section provides our methodology and some explanatory information about how we categorized the events and what are and are not included under each category.

Although the categories Film and High School Events were not part of our audit scope, we included them to show the full range of special event categories that SPD charges hours to. We did not perform any detailed analysis of these categories.

²⁷ SPD payroll data uses "Activity IDs" to identify events. In some cases, an Activity ID is a "bucket" for charging hours for similar type events and activities. In most cases, however, a unique Activity ID is assigned to a unique event.

Categorization of Permit Events Consistent over Audit Scope

For annual or repeating events that obtained special event permits between 2010 and 2016, we categorized the event over all the years according to how the City's Special Events Office (SEO) categorized it in 2016. For example, until 2015, SEO categorized many events as Parades. SEO stopped using this category in 2016 and began categorizing parades as Community events.²⁸ For this audit, we revised past Parade category events to the Community category to be consistent with SEO's 2016 categorization of these events. Starting in 2016, SEO used the following special event categories: Community, Commercial, Athletic, Free Speech, Mixed Free Speech, and Citywide.

A specific example is the Seafair Torchlight Parade. This event was categorized as a Parade from 2010 through 2015 and as a Citywide event in 2016. In our analysis, we categorized this event as Citywide from 2010 through 2016 so we didn't split hours for the same event between multiple categories over time (e.g., group Torchlight hours under Parades one year but under Citywide events the next).

Audit Analysis Categories and Descriptions

1. Large Seattle Center Festivals

- a. This category includes Bite of Seattle, Bumbershoot, and Folklife, which are each comprised of numerous components using several Activity IDs to which SPD charges its hours.

2. Dignitary

- a. Includes visits by national and international dignitaries.

3. Event Emphasis

- a. Includes emphasis Activity IDs related to a special event that is already categorized as such (i.e., a distinct event, with or without a permit)
- b. Includes emphasis related to an event that is not already categorized as a distinct special event, but could reasonably be identified from the Activity ID description that the emphasis is related to an event, e.g., University of Washington (UW) Husky football games, Christmas Ship Escorts, Seattle King County Medical Clinics, etc.
- c. Includes "Night Out" events.
- d. Does not include emphasis related to:
 - i. Normal law enforcement work
 - ii. Areas-around-town emphasis
 - iii. Seasonal holidays (e.g., New Year's Day, Christmas Day, Mardi Gras, etc.)
 - iv. National events (e.g., Election Day)
 - v. Contracted emphasis (e.g., MID, Sound Transit, etc.)
 - vi. High School events (sports, proms, etc.); this is included in the "HS Event – Local & Regional" category.

4. Film

- a. Activity IDs for events that get a film permit, such as filming a commercial.

²⁸ Although Ordinance 124860 includes the category of Parade, the permit fees are the same as those for Community events, and so there is no cost impact of SEO's change in categorization.

5. High School Event – Local and Regional

- a. Includes sports games, dances, proms, and graduations.
- b. Includes events coded as SC and SCE for above type events.²⁹
- c. Does not include above type events at stadiums (Seahawks/ Mariners, etc.). These are categorized under “Stadium Event Other.”
- d. Includes general ACTIVITY IDs for above type events, such as WSHSBASKETBALL (for West Seattle High School [HS] Basketball), WSHDANCE (for West Seattle HS Dance), WSHSFOOTBALL (for West Seattle HS Football), or WSHSHOMECOMING (for West Seattle HS Homecoming).
- e. Includes emphasis for above type events, such as 03V14R (for Washington Middle School Graduation) or 03V17R (for West Seattle High School Activities).

6. Athletic Events

- a. Includes Athletic category events, such as marathons and fun runs, regardless of whether they obtained an SEO permit³⁰

7. Citywide

- a. Seattle has five designated Citywide events: Fremont Solstice Parade, My Macy’s Holiday Parade, Seafair Weekend (hydroplane races and Blue Angels show), Seafair Torchlight Parade, and Seafair Summer Fourth on Lake Union.
- b. Additional 2010-2016 Citywide events included: 2010 Seattle Storm Championship Parade, 2014 Super Bowl Parade, 2016 Sounders – Major League Soccer (MLS) Cup Championship March and Rally.
- c. Also includes planning hours charged to ACTIVITY ID 15FE37, Seahawks/Welcome Home Celebration, even though this event did not ultimately occur. These data are categorized as Citywide – NP.

8. Commercial

- a. Includes Commercial category events, both those that obtained SEO permits and those that did not.

9. Community

- a. Includes Community category events, both those that obtained SEO permits and those that did not.

10. Free Speech

- a. Includes Free Speech category events, both those that obtained SEO permits and those that did not.

11. Mixed Free Speech

- a. Includes Mixed Free Speech events (i.e., Capitol Hill Pride Festival, Hempfest, Seattle Pride Parade); all obtained SEO permits.

12. Professional Sports Events

²⁹ Typically, SPD codes Activity IDs according to year, month, and event number (e.g., 16SE100 means 2016, September, event #100). For some Activity IDs, SC and SCE are used instead of the month to identify them as a Seattle Center contract event (SC), or as an Other Reimbursable Events (SCE). Many, but not all, SCE events occur on or near the Seattle Center. For these events, a sergeant in the West Precinct writes MOUs between the organizer and SPD.

³⁰ Included as NP (No Permit) events are a few events that applied for permits and received permit numbers but no permit was issued because the event was cancelled (e.g., due to weather or other factors). The events were the Husky Open Regatta, cancelled due to weather, and Night Light.

- a. Mariners Games (Safeco Field)
- b. Reign Games (Memorial Stadium) [These are all SCE events but categorized here under professional sports events.]
- c. Seahawks Games (CenturyLink Field)
- d. Sounders Games (CenturyLink Field)
- e. Storm Games (Key Arena) [These are SC and SCE events but categorized here under professional sports events.]

13. Other Reimbursable Events

- a. Includes SCE events, and most are related to Seattle Center. MOUs between SPD and the event organizer are written by a sergeant in the West Precinct.
- b. Includes other miscellaneous reimbursable events that could not be categorized under other event categories (e.g., Tech Ed Microsoft, Bubbling Brown Sugar, Hunts Point Private Fireworks Show, Imagine Cup).

14. Seattle Center MOU Events

- a. Includes Seattle Center events reimbursed under the MOU between SPD and the Seattle Center.
- b. Does not include Storm, Bumbershoot, Bite of Seattle, or Folklife events.

15. Stadium (Safeco/ CenturyLink/ WAMU Theater/etc.) Events

- a. Includes Athletic, Concert, Husky Football, and other events at the Safeco or Century Link stadiums, or the WAMU Theater.

16. University of Washington (UW) Husky Stadium and Hec Edmundson Pavilion Events

- a. Includes UW Husky football games and other events (e.g., UW Commencement, Jehovah Witness Meeting) and Hec Edmundson Pavilion events.

Results

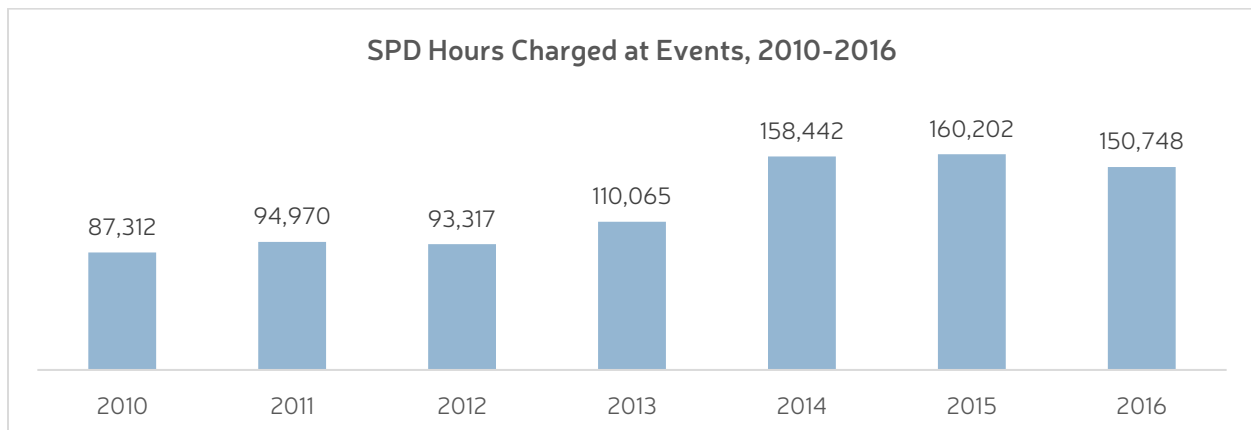
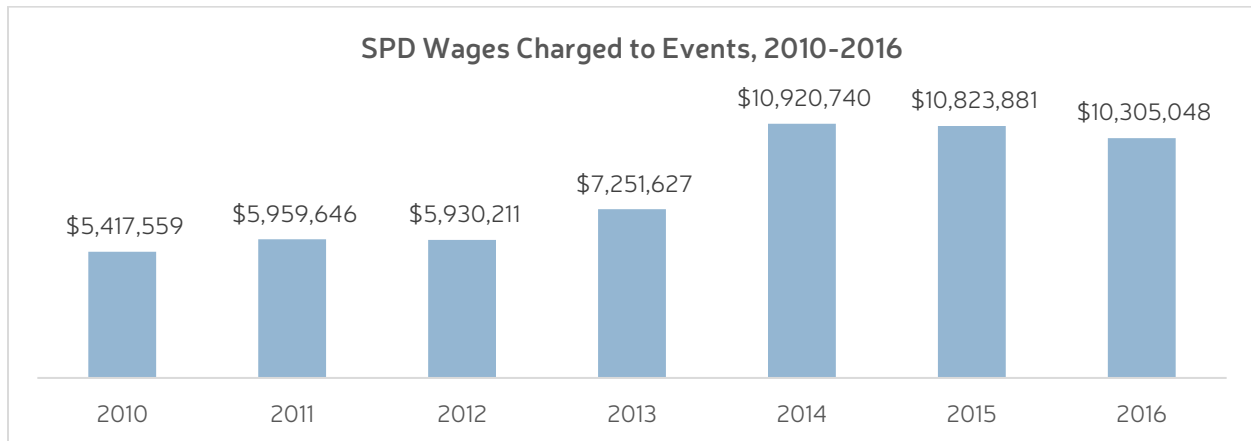
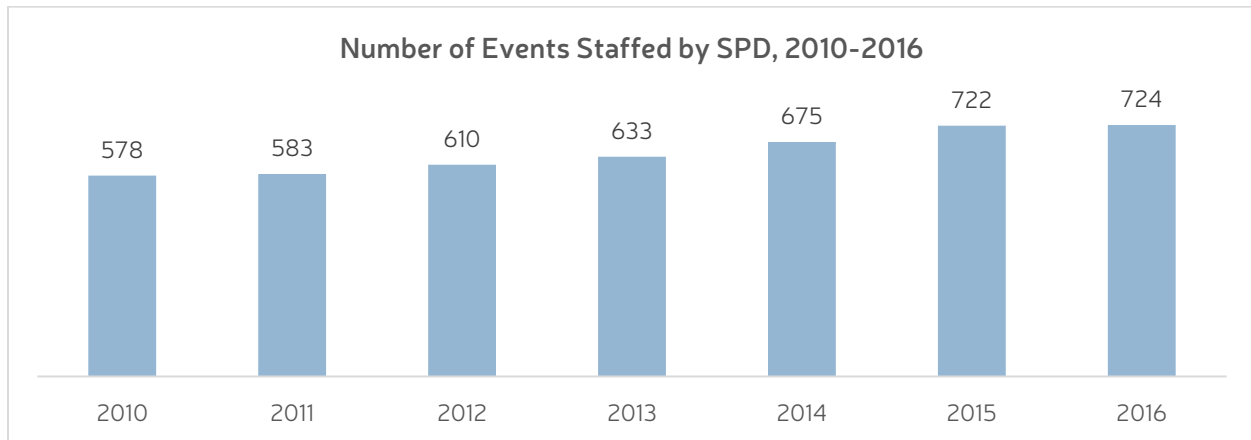
The results of our data analysis by event category are included in Appendix B. The following section discusses our six conclusions related to our payroll data analysis.

Data Analysis Conclusions

1. Between 2010 and 2016, the number of special events staffed by SPD gradually increased. SPD wages for special events increased significantly in 2013 and 2014 and then decreased in 2015 and 2016, and hours charged increased significantly from 2013 through 2015 and decreased in 2016.

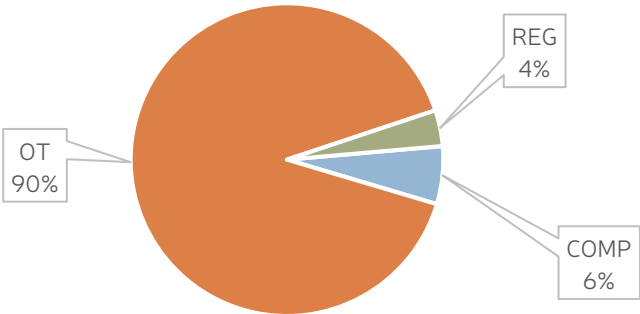
For all Event Categories, between 2010 and 2016:

- Number of Events = 25% increase
- SPD Wages = 90% increase
- SPD Hours = 73% increase

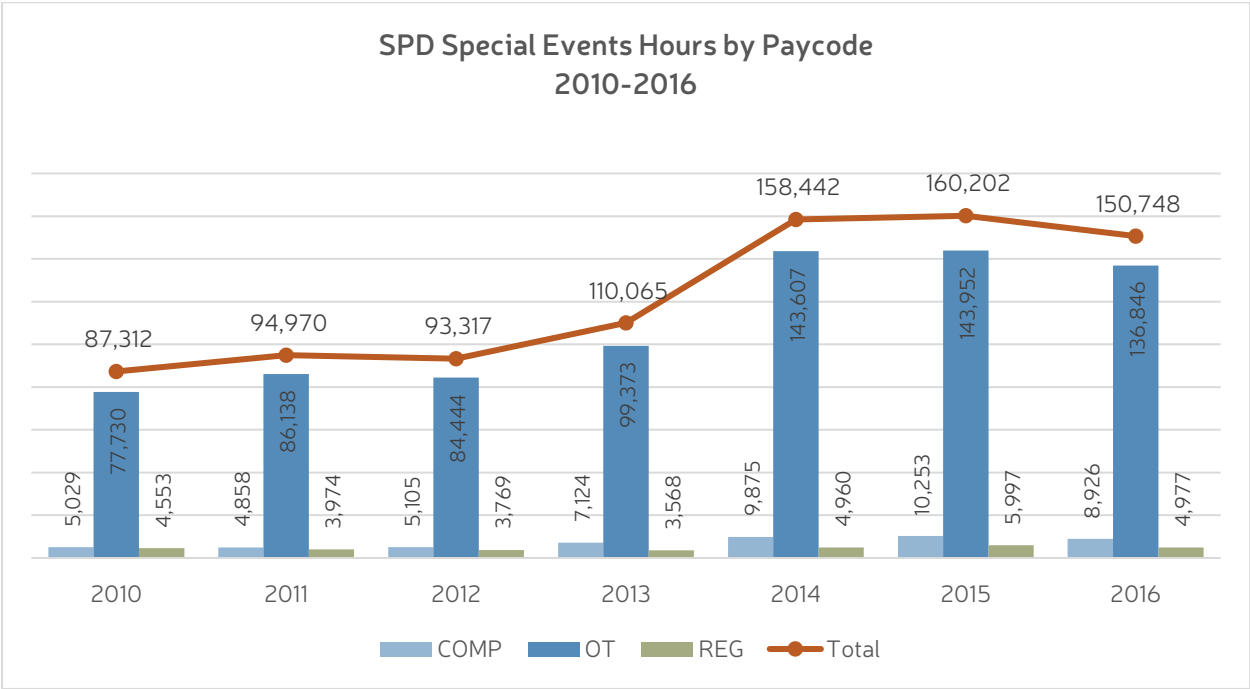


2. From 2010-2016, the majority (90%) of hours SPD spent staffing special events was charged as Overtime (OT). Compensatory (Comp) and Regular (Reg) time comprised only 10% of charged hours.

Percentage of SPD Special Events Hours by Paycode
2010-2016

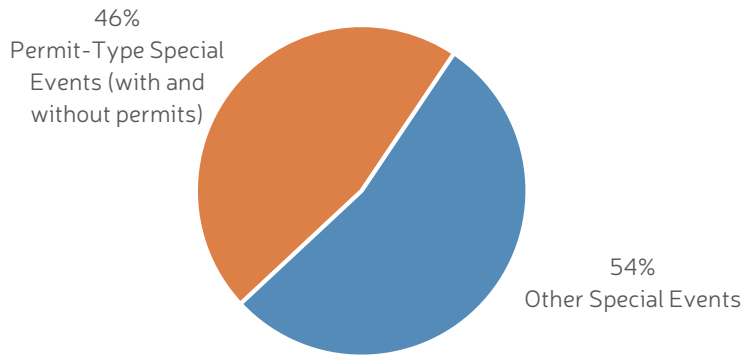


SPD Special Events Hours by Paycode
2010-2016



3. Special events requiring an SEO permit accounted for about 46% of total wages spent by SPD on special events between 2010 and 2016. The other 54% of wages were spent on events that included dignitary escorts, professional sports games, and many events that took place at the Seattle Center, including some large festivals.³¹

Percent of Total SPD Wages for Permit-Type Special Events vs Other Special Events 2010-2016



In the 46% of events requiring an SEO permit, we included events that obtained a permit (37%) from SEO as well as those events (9%) that either did not obtain the required permit or those events for which it was unclear to us whether a permit was required. As can be seen in the exhibit below, most of the events that met the requirements for a permit, but had not obtained one, were those in the Free Speech category.

Breakdown of 46% Permit-Type Event Categories – 2010-2016		
	Obtained SEO Permits	Did not obtain SEO Permits
Athletic	6.2%	0.2%
Citywide	13.2%	0.0%
Commercial	3.3%	0.4%
Community	6.2%	0.1%
Free Speech	5.4%	8.3%
Mixed Free Speech	3.1%	0.0%
	37%	9%

³¹ The large festivals that occur on Seattle Center grounds (i.e., Bite of Seattle, Folklife, and Bumbershoot) often receive a permit for components of the event, such as a street closure, but they primarily obtain police services outside the SEO permit process.

4. Top 100 Events 2010-2016 (by SPD Wages)

Below we list the SPD Activity IDs with highest total dollars in wages. Event names listed in this chart are as they appear in the SPD payroll data.

Some of the Activity IDs were for events that occurred over multiple days. For example, Activity ID 14NO457 was used to track hours to “Ferguson, MO Grand Jury Findings” on 42 separate days in 2014 and 3 days in 2015.³²

Rank	Year	Activity ID	Event	Dollars (SPD Wages)	Event Category
1	2014	14NO457	Ferguson, MO Grand Jury Findings	\$ 1,686,943	Free Speech
2	2015	15SE403	President of China Visit	\$ 769,245	Dignitary
3	2016	16MY138	May Day	\$ 576,426	Free Speech
4	2016	16JY275	Seafair Summer Fourth	\$ 525,651	Citywide
5	2011	11OC343	Occupy Seattle Protest	\$ 491,367	Free Speech
6	2014	14JY216	Seafair Summer Fourth	\$ 484,897	Citywide
7	2015	15JY227	Seafair Summer Fourth	\$ 481,934	Citywide
8	2015	15MY167	May 1st March & Rally Immigrant & Worker Rights	\$ 446,092	Free Speech
9	2014	14FE63	Super Bowl Parade	\$ 433,869	Citywide
10	2016	16AU304	Seafair Weekend	\$ 368,762	Citywide
11	2016	16JY274	Torchlight Parade at Seafair	\$ 353,664	Citywide
12	2015	15JY222	Seafair Hydros Weekend	\$ 352,025	Citywide
13	2015	15JY223	Seafair Torchlight Parade	\$ 340,129	Citywide
14	2014	14JY210	Seafair Torchlight Parade	\$ 332,067	Citywide
15	2016	16JU296	President Obama Visit	\$ 330,168	Dignitary
16	2014	14AU211	Seafair Weekend - Hydros and Blue Angels	\$ 327,172	Citywide

³² The dates for which hours were recorded to Activity ID 14NO457 were in 2014 (October 27 and 29; November 5, 7, 10, 12, 13, 17-21, and 24-30; December 1-17, 19, 20, 22, 24, 26, and 28) and in 2015 (January 12, 14, and 27).

Special Events - Police Staffing and Cost Recovery

17	2013	13JY203	Seafair Fourth of July Fireworks Celebration	\$ 321,620	Citywide
18	2014	14MY100	May Day March	\$ 317,425	Free Speech
19	2013	13JY155	Seafair Torchlight Parade	\$ 300,843	Citywide
20	2012	12AU58	Seafair Hydroplane Race and Airshow	\$ 296,338	Citywide
21	2016	16JY368	Not this Time	\$ 295,752	Free Speech
22	2010	10JY47	Seafair Torchlight Parade	\$ 283,476	Citywide
23	2010	10AU48	Seafair Hydroplane Races & Air Show	\$ 282,885	Citywide
24	2011	11JY50	Seafair Torchlight Parade	\$ 271,563	Citywide
25	2012	12JY57	Seafair Torchlight Parade	\$ 265,506	Citywide
26	2015	15JU275	June Against Doom (6/5, 6/6, 6/8)	\$ 265,402	Free Speech
27	2011	11AU53	Seafair Hydroplane Race and Airshow	\$ 257,865	Citywide
28	2013	13AU156	Seafair Weekend Hydroplane Race & Airshow	\$ 256,780	Citywide
29	2010	10JY109	Family 4th at Lake Union	\$ 248,793	Citywide
30	2012	12JY230	Fourth of July	\$ 245,859	Citywide
31	2014	14FE49	Super Bowl - Seahawks vs Broncos	\$ 218,228	Professional Sports Events
32	2016	16AU1	Hempfest	\$ 212,993	Mixed Free Speech
33	2015	15AU19	Seattle Hempfest	\$ 207,730	Mixed Free Speech
34	2013	13MY161	May Day Immigration March	\$ 206,827	Free Speech
35	2016	16NO486	Tree Lighting Celebration	\$ 193,175	Community
36	2014	14AU88	Seattle Hempfest 2014	\$ 187,263	Mixed Free Speech
37	2013	13JY149	Bite of Seattle (Street Use/No Parking)	\$ 183,535	Seattle Center Large Festival Events
38	2013	13AU26	Hempfest	\$ 183,164	Mixed Free Speech
39	2014	14SE161	NFL Kickoff	\$ 178,500	Professional Sports Events

Special Events - Police Staffing and Cost Recovery

40	2015	15OC497	POTUS Visit	\$ 173,852	Dignitary
41	2016	16JU144	Seattle Pride Parade	\$ 167,056	Mixed Free Speech
42	2015	15NO515	27th Annual Tree Lighting	\$ 165,548	Community
43	2016	16MY58	NW Folklife Staging and Production	\$ 156,067	Seattle Center Large Festival Events
44	2013	13NO415	POTUS Visit	\$ 155,558	Dignitary
45	2014	14JA12	Seahawks Playoff Game - Seahawks vs 49'ers	\$ 153,969	Professional Sports Events
46	2013	13OC392	Freak Night	\$ 151,471	Stadium (Seahawks/Century Link/WAMU Theater/etc.) Events
47	2010	10JY222	Bite of Seattle	\$ 151,185	Seattle Center Large Festival Events
48	2013	13AP183	Large Event Protection Detail	\$ 151,074	Event Emphasis
49	2012	12JY232	Bite of Seattle	\$ 150,391	Seattle Center Large Festival Events
50	2011	11JY172	Family 4th at Lake Union	\$ 146,012	Citywide
51	2015	15MY60	NW Folklife Staging and Production	\$ 145,752	Seattle Center Large Festival Events
52	2013	13MY198	Folklife Festival	\$ 139,886	Seattle Center Large Festival Events
53	2014	14MY77	NW Folklife Festival Staging & Production (Street Use)	\$ 137,898	Seattle Center Large Festival Events
54	2014	14JY194	Bite of Seattle (Street Use/No Parking)	\$ 137,414	Seattle Center Large Festival Events

Special Events - Police Staffing and Cost Recovery

55	2011	11JY169	Bite of Seattle	\$ 135,056	Seattle Center Large Festival Events
56	2012	12AU166	Hempfest	\$ 131,234	Mixed Free Speech
57	2015	15JY207	Bite of Seattle (Street Use/No Parking)	\$ 126,504	Seattle Center Large Festival Events
58	2012	12MY218	May 1st March and Rally	\$ 124,773	Free Speech
59	2016	16JY44	Capital Hill Block Party	\$ 124,502	Commercial
60	2010	10AU122	Hempfest	\$ 121,572	Mixed Free Speech
61	2013	13V11	Seahawk's Emphasis Patrol	\$ 120,322	Event Emphasis
62	2016	16JY157	Bite of Seattle Street Use	\$ 120,128	Seattle Center Large Festival Events
63	2015	15JA23	Seahawks vs Green Bay Packers Playoff Game	\$ 120,080	Professional Sports Events
64	2015	15JU134	Seattle Pride Parade	\$ 119,385	Mixed Free Speech
65	2014	14DE448	New Year's at the Needle	\$ 117,555	Commercial
66	2014	14JU83	Seattle Pride Parade and March	\$ 114,939	Mixed Free Speech
67	2015	15JU268	Wildrose Pride	\$ 109,953	Commercial
68	2011	11AU296	Bumbershoot (Street Use/Staging)	\$ 105,276	Seattle Center Large Festival Events
69	2014	14T125	Seahawks vs Raiders	\$ 100,913	Professional Sports Events
70	2015	15DE543	New Year's at the Needle	\$ 98,974	Commercial
71	2014	14OC423	VP Biden Visit	\$ 98,610	Dignitary
72	2016	16AU404	(Black Lives Matter) March on Seattle	\$ 98,449	Free Speech
73	2015	15JY22	Capitol Hill Block Party	\$ 97,361	Commercial
74	2016	16DE503	New Year's at the Needle	\$ 95,725	Commercial
75	2014	14JU234	Wildrose Pride	\$ 94,143	Commercial
76	2016	16NO506	Protest Trump in Seattle	\$ 93,761	Free Speech

Special Events - Police Staffing and Cost Recovery

77	2016	16JU108	Wildrose Pride	\$ 92,908	Commercial
78	2013	13JU93	Rock & Roll Marathon & Half Marathon	\$ 91,888	Athletic
79	2014	P75394	2014 Husky Football - SWAT at the Stadium	\$ 90,816	UW Husky Stadium Hec Edmundson Pavilion Events
80	2010	10JU57	Rock 'N Roll Seattle Marathon & 1/2 Marathon	\$ 90,329	Athletic
81	2015	15SCE146	Bumbershoot	\$ 86,848	Seattle Center Large Festival Events
82	2010	10V11	Folklife Festival	\$ 84,500	Seattle Center Large Festival Events
83	2014	14JU225	Rock 'n' Roll Marathon and 1/2 Marathon	\$ 83,634	Athletic
84	2011	11JU83	Rock 'n' Roll Seattle Marathon & Half Marathon	\$ 83,421	Athletic
85	2015	15JU276	Rock and Roll Marathon	\$ 79,849	Athletic
86	2016	16SCE184	Bumbershoot	\$ 79,324	Seattle Center Large Festival Events
87	2012	12MY93	NW Folklife Festival Staging & Production	\$ 78,968	Seattle Center Large Festival Events
88	2016	16JA9	MLKing Committee 34th Annual March and Rally	\$ 77,809	Free Speech
89	2014	14NO426	Seattle Marathon	\$ 77,437	Athletic
90	2013	13DE407	New Year's at the Needle	\$ 77,270	Commercial
91	2015	15MY214	Women of Color for Systematic Change & Black Lives Matter Meeting	\$ 76,642	Free Speech
92	2014	14JA9	Seahawks Playoff Game - Seahawks vs Saints	\$ 76,302	Professional Sports Events

Special Events - Police Staffing and Cost Recovery

93	2014	14SCE160	Bumbershoot	\$ 76,128	Seattle Center Large Festival Events
94	2016	16OC489	Presidential Candidate Hillary Clinton Visit	\$ 75,841	Dignitary
95	2016	16JU142	Rock and Roll Marathon	\$ 71,920	Athletic
96	2014	14JY44	Capitol Hill Block Party	\$ 71,827	Commercial
97	2016	16MA162	VPOTUS Biden Visit	\$ 71,482	Dignitary
98	2011	11AU30	Seattle Hempfest 2011	\$ 71,384	Mixed Free Speech
99	2011	11NO361	Defend Education Rally and March	\$ 69,360	Free Speech
100	2016	16NO482	Seattle Children's Marathon	\$ 68,743	Athletic

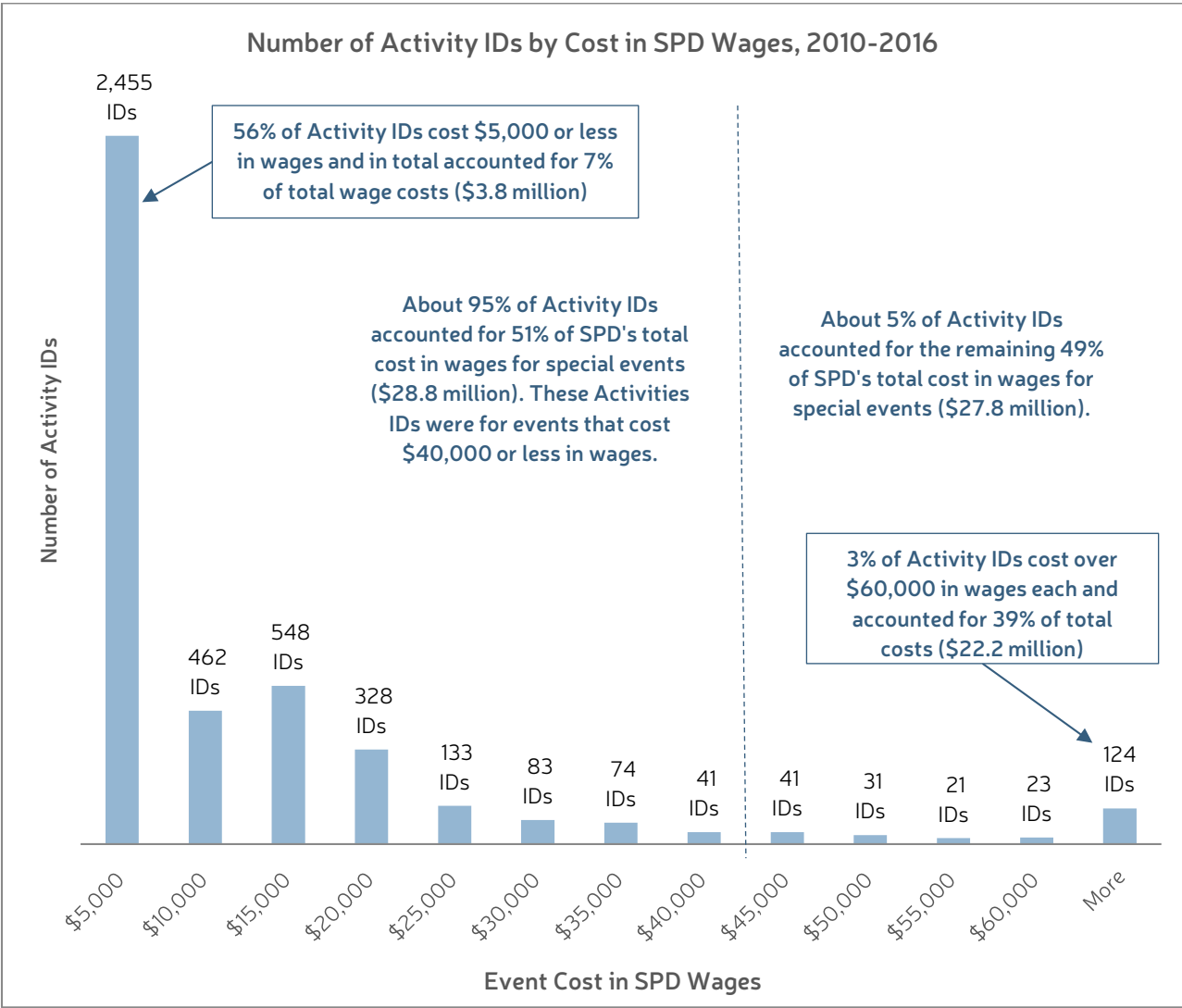
Color Legend by Event Category:

1. Seattle Center Large Festival Events (Bite of Seattle, Bumbershoot, Folklife)
2. Dignitary
3. Event Emphasis
4. Film
5. High School Events (Local & Regional)
6. Athletic Events
7. Citywide Events
8. Commercial Events
9. Community Events
10. Free Speech Events
11. Mixed Free Speech Events
12. Professional Sports Events
13. Other Reimbursable Events
14. Seattle Center MOU Events
15. Stadium (Safeco/ Century Link/ WAMU Theater/etc.) Events
16. UW Husky Stadium and Hec Edmundson Pavilion Events

5. Distribution of Activity IDs by Cost (SPD Wages)

About 95% of SPD Activity IDs* were for events that cost \$40,000 or less in police wages. These Activity IDs together accounted for just over half (51%) of the total cost of SPD’s wages for special events between 2010 and 2016. About 5% of Activity IDs were for events that cost more than \$40,000 in police wages, and these accounted for the remaining 49% of total wage costs. In other words, a relatively small percentage of Activity IDs cost over \$40,000 to police and accounted for almost half of the total cost of events.

* SPD payroll data uses Activity IDs to identify events; however, in some cases, a single Activity ID may be used for multiple events. For example, a single Activity ID was used to track the hours and costs SPD spent staffing multiple 2014 protests after the Ferguson, MO Grand Jury Findings; and this Activity ID is included in the 3 percent of IDs that are associated with 39 percent of total wage costs.



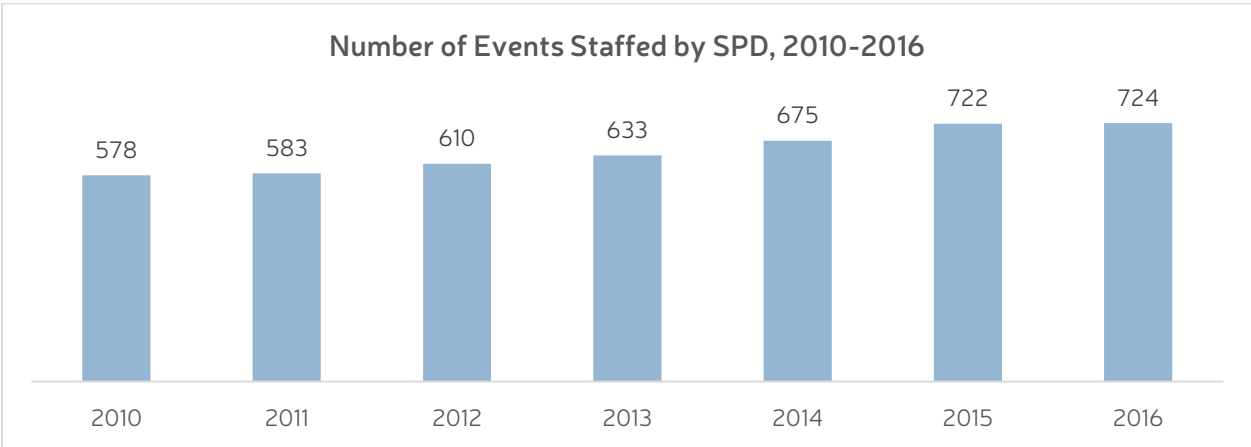
APPENDIX B

Data Tables – Section A: Overall Trends

1. Number of Events, 2010-2016

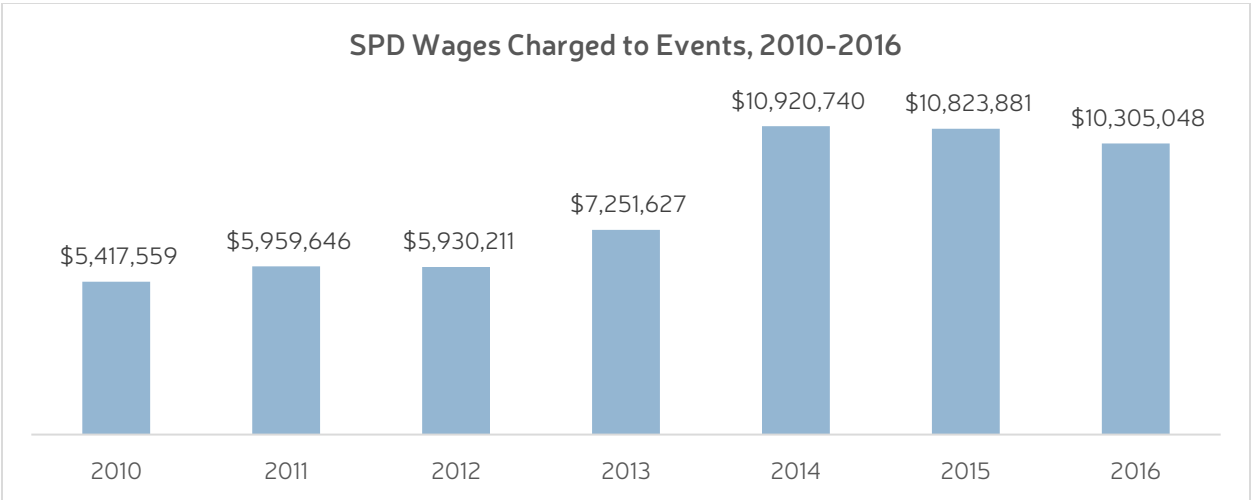
The trend indicates there has been a gradual increase over 2010-2016.

The Seattle Police Department (SPD) payroll data uses “Activity IDs” to identify events. In some cases, an Activity ID is a “bucket” for charging hours for similar type events and activities. In most cases, however, a unique Activity ID is assigned to each event.



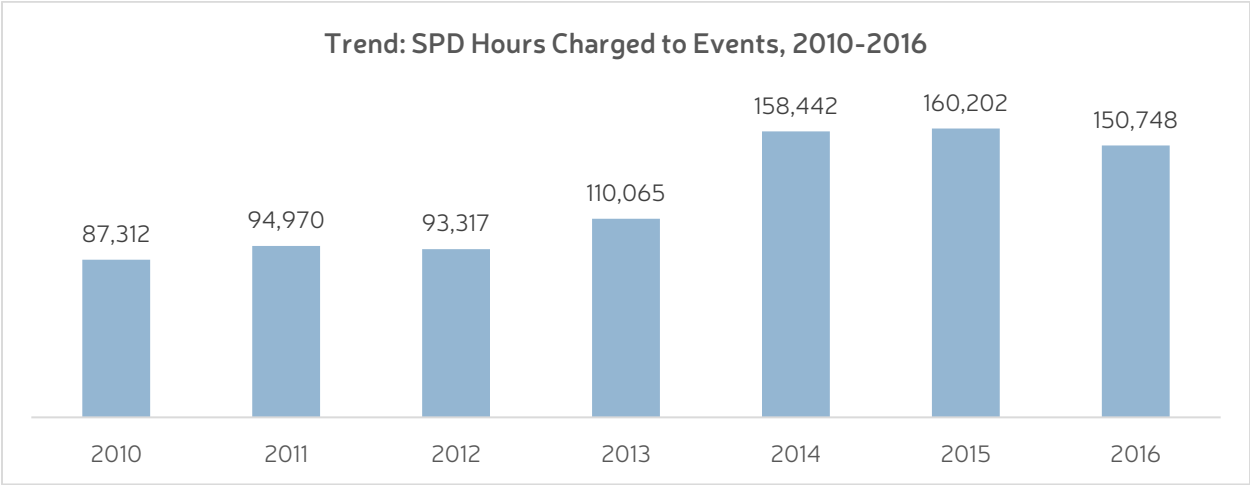
2. SPD Wages Charged to Events, 2010-2016

The trend indicates there was a steep increase in 2014 and a decrease beginning in 2015.



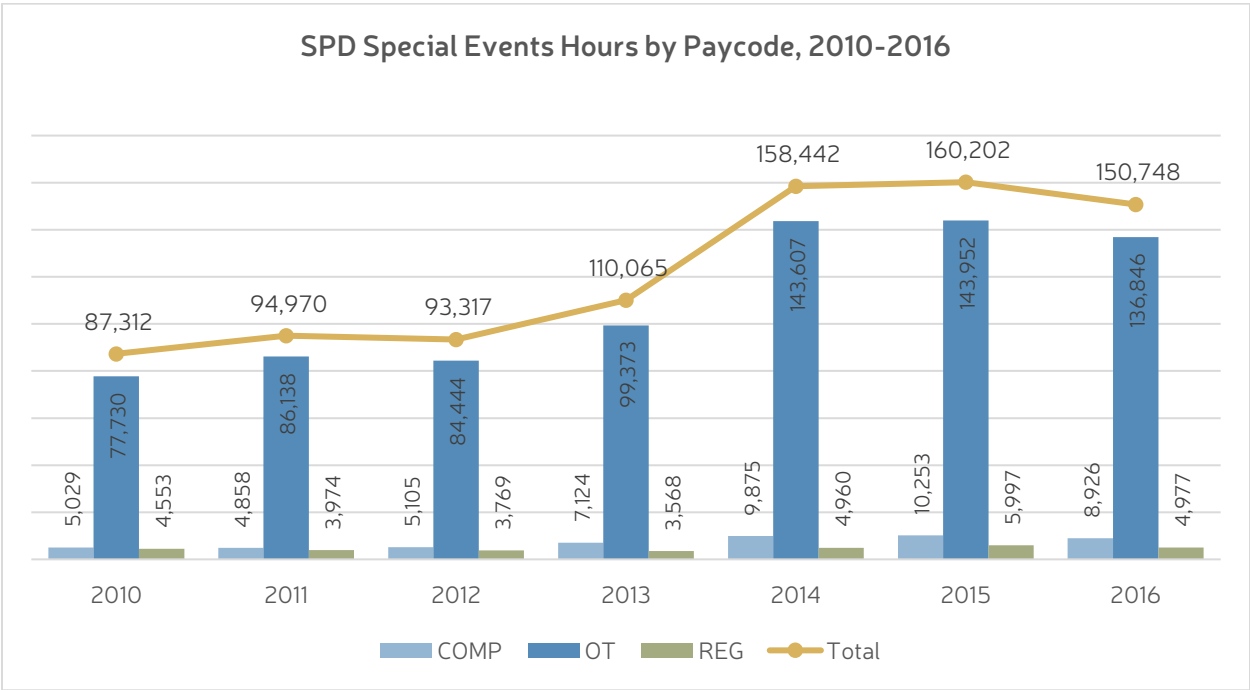
3. SPD Hours Charged to Events 2010-2016

The trend indicates there was a steep increase in 2014 and a decrease beginning in 2015.

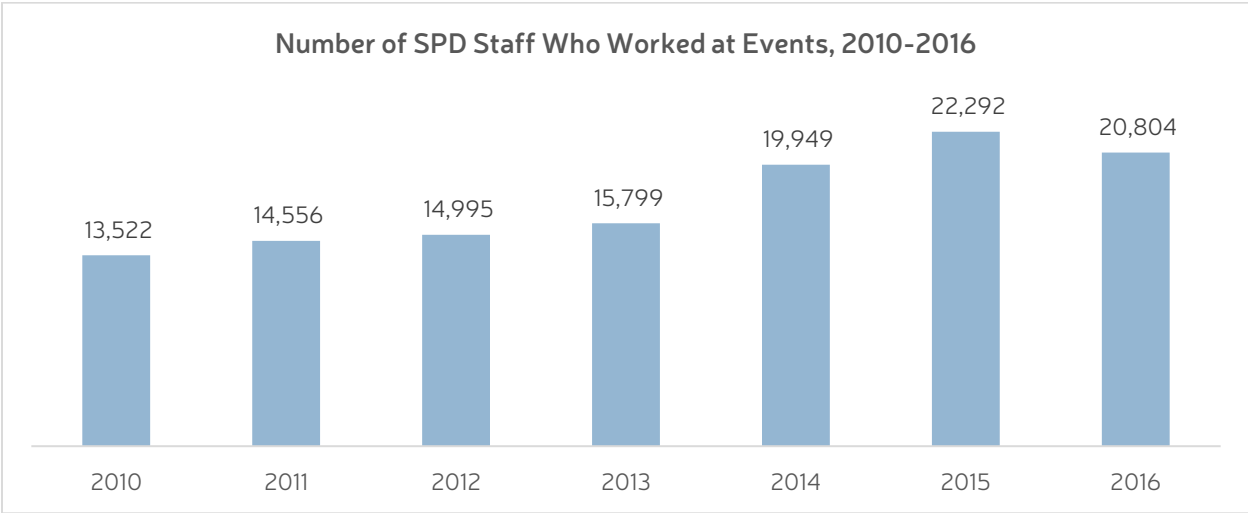


4. SPD Hours Charged to Events by Paycode, 2010-2016

Most hours charged to events were paid as Overtime (OT). Some hours worked for events were paid at Compensatory (Comp) and Regular (Reg) time.

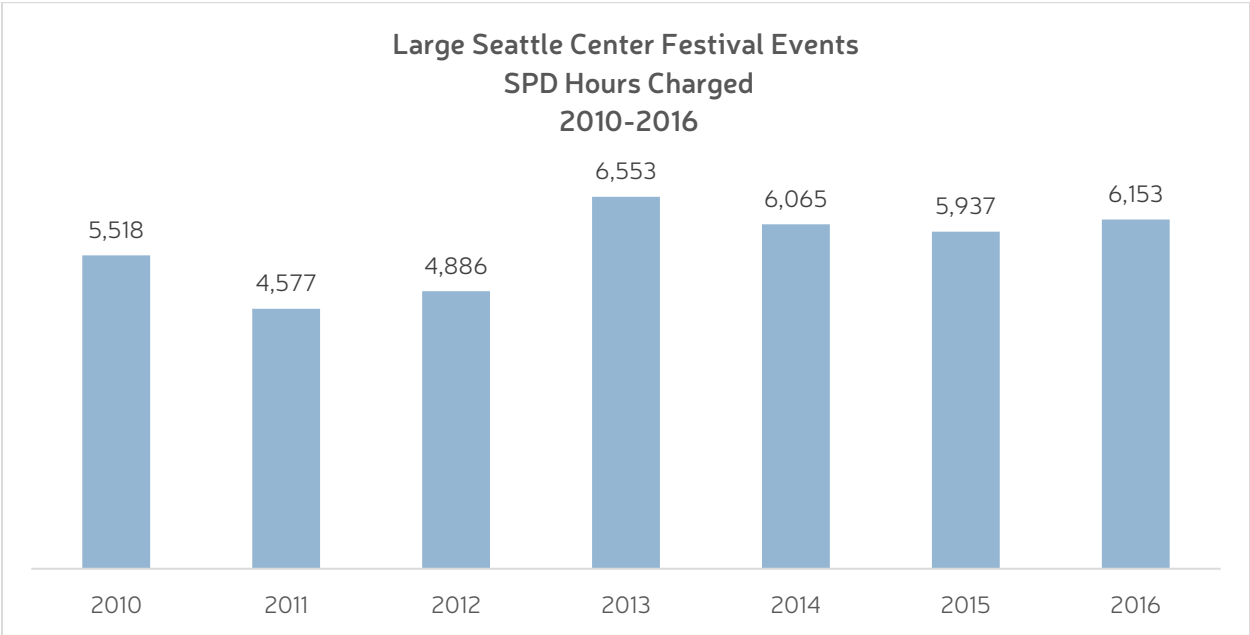
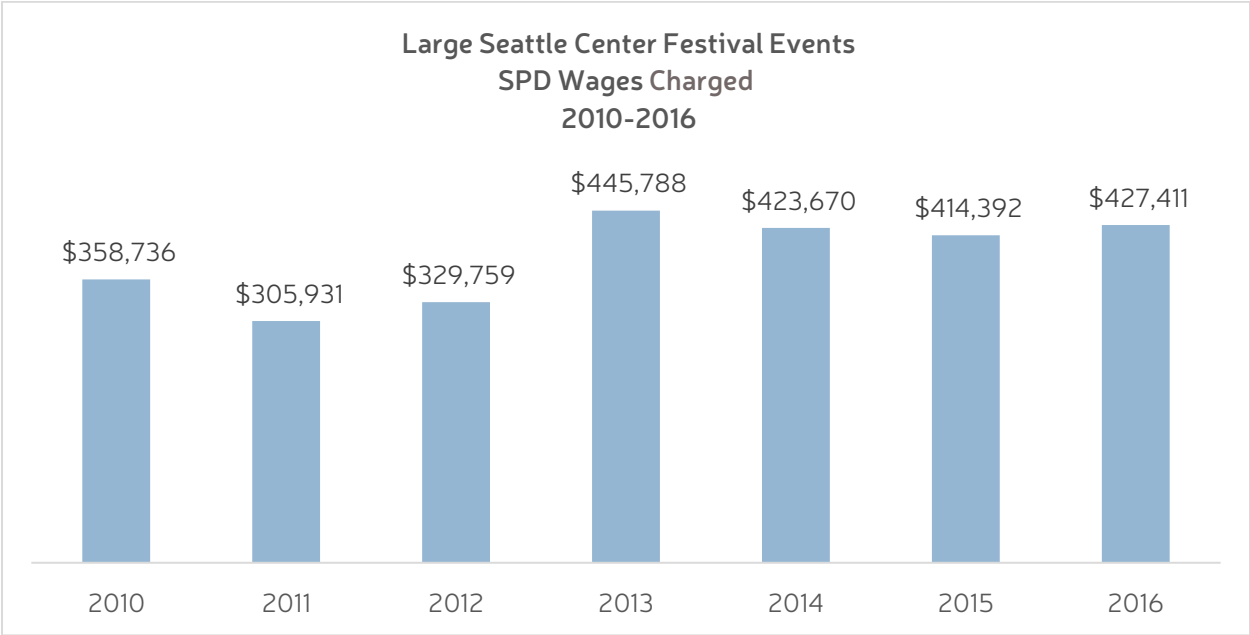


5. Number of SPD Staff Working Events from 2010-2016



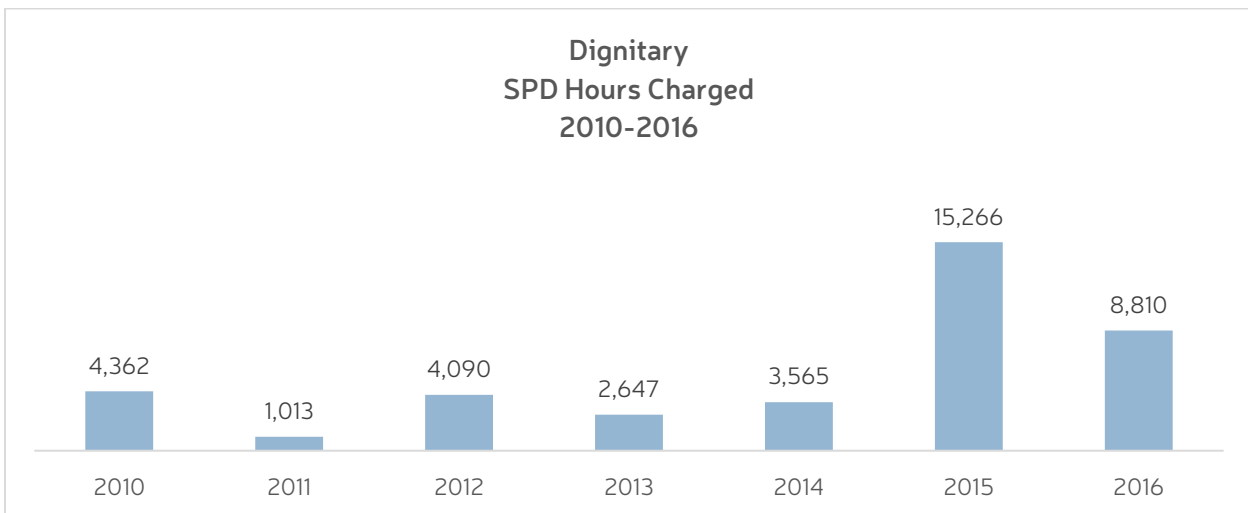
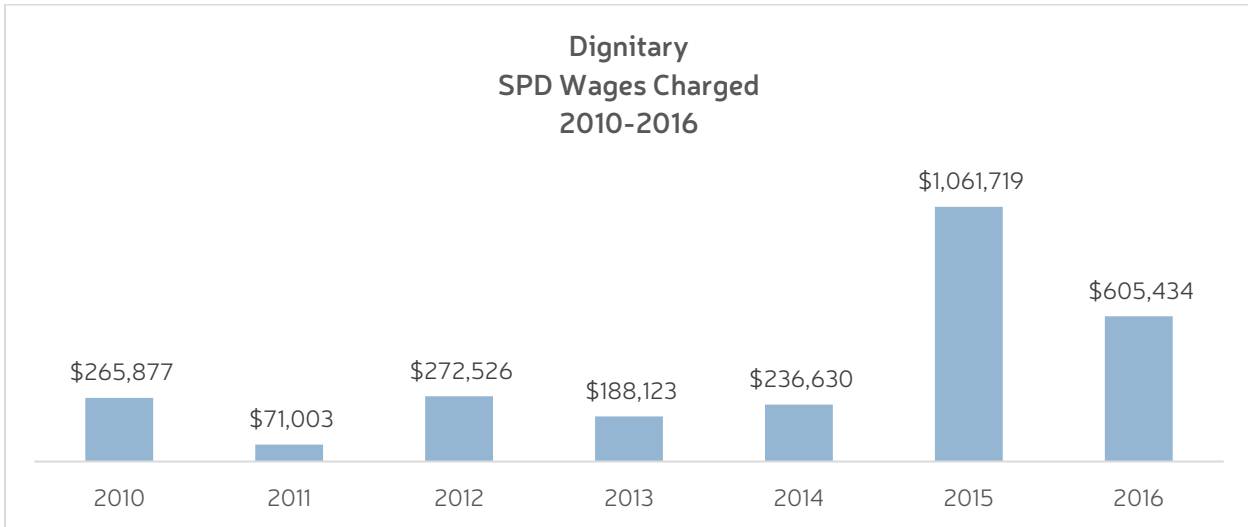
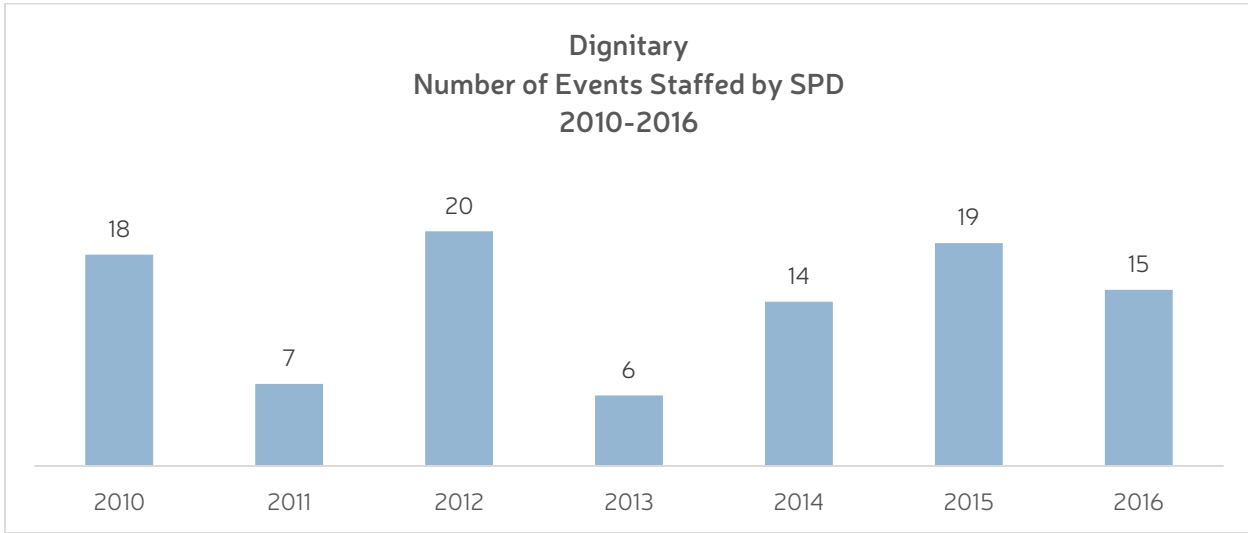
Section B: Event Category Data

1. Large Seattle Center Festival Events (Bite of Seattle, Bumbershoot, Folklife)



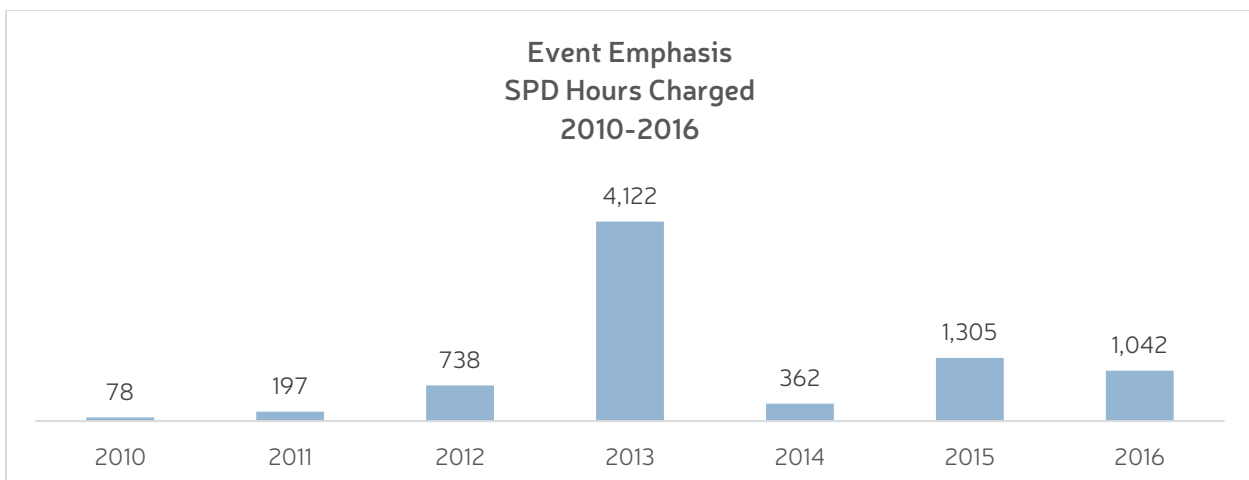
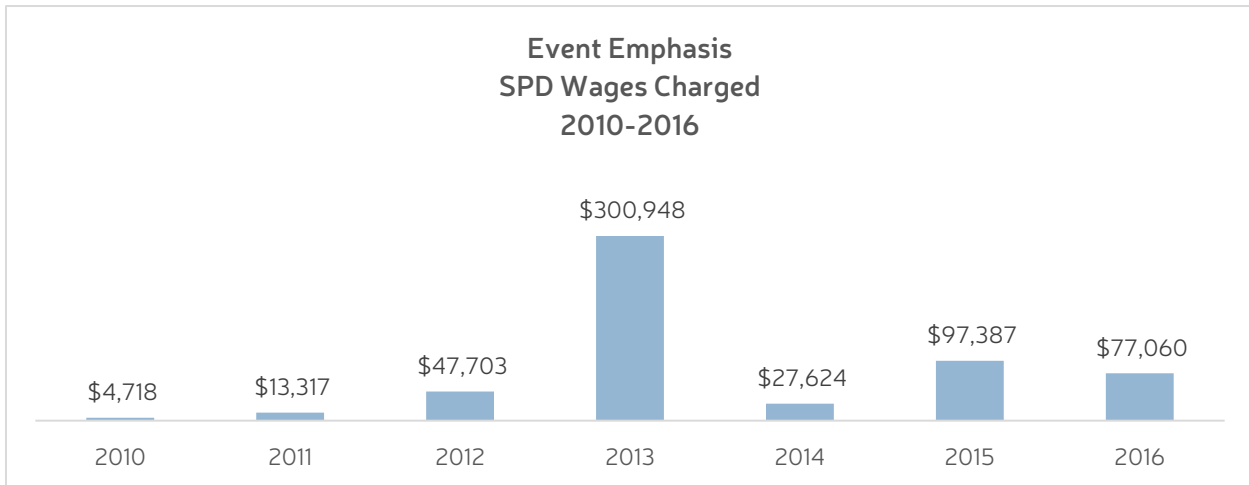
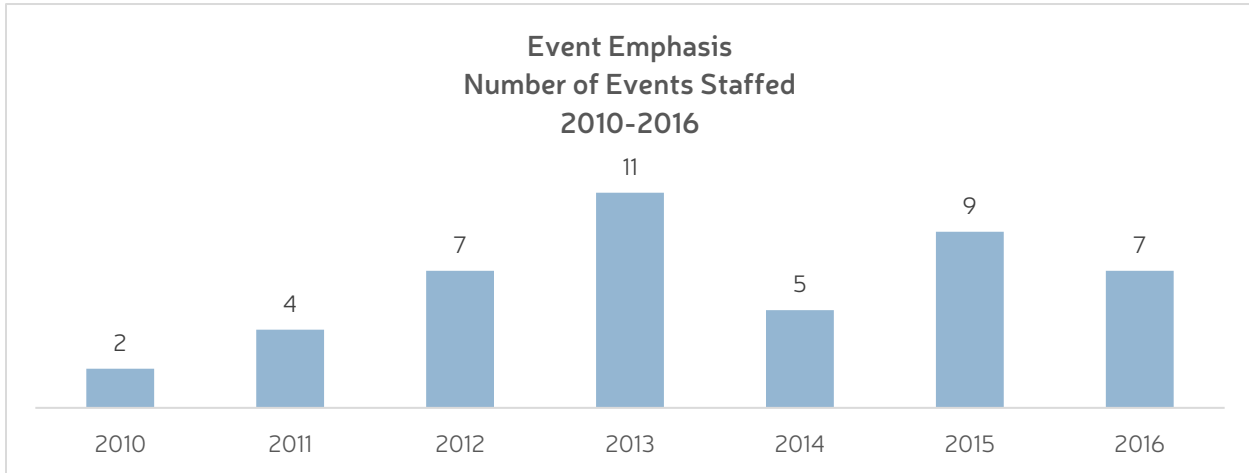
2. Dignitary

This event category includes visits by national and international dignitaries that required SPD staffing.



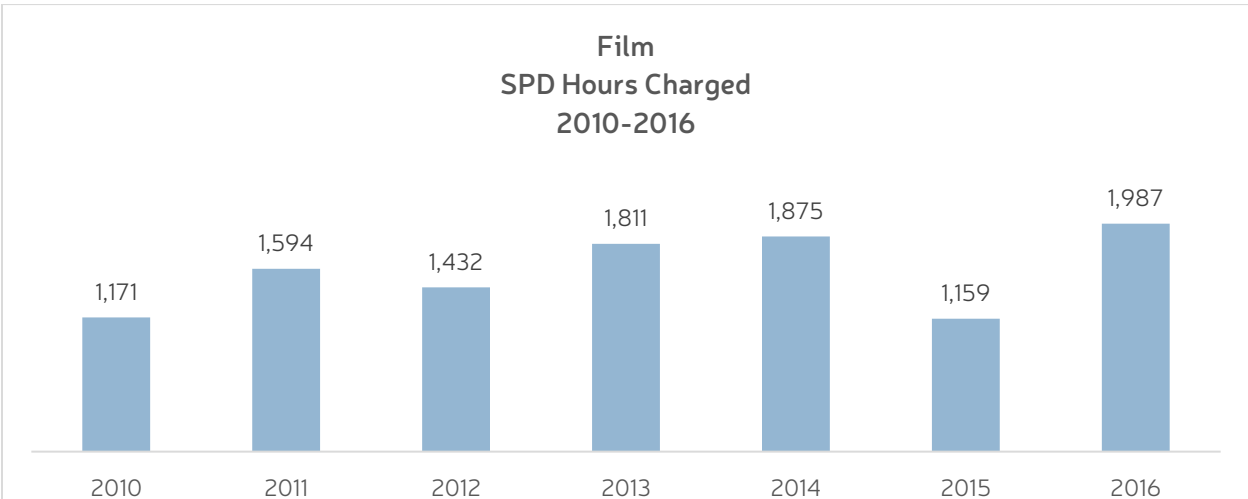
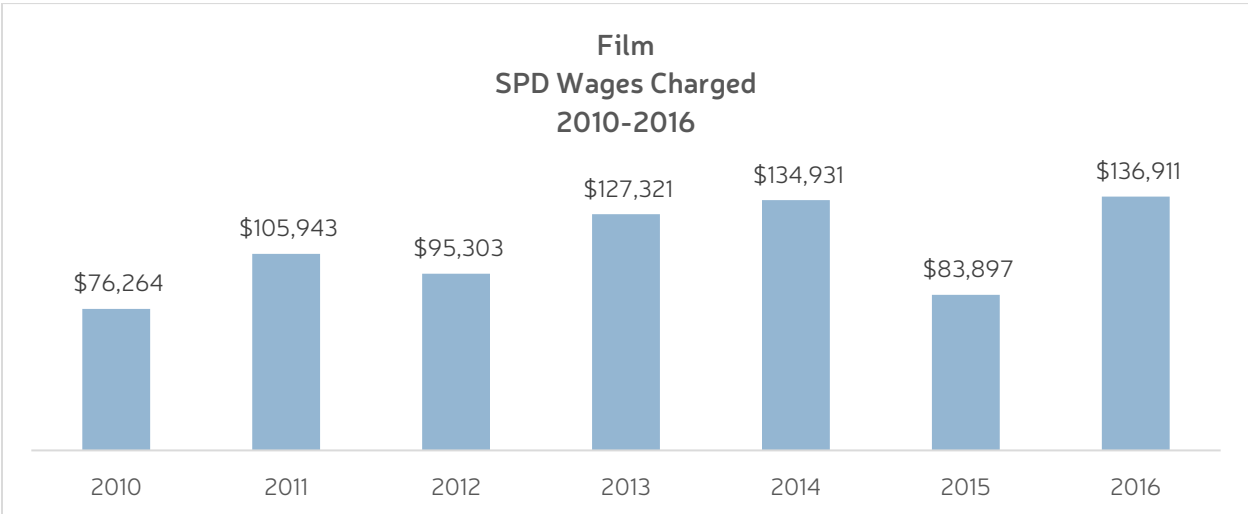
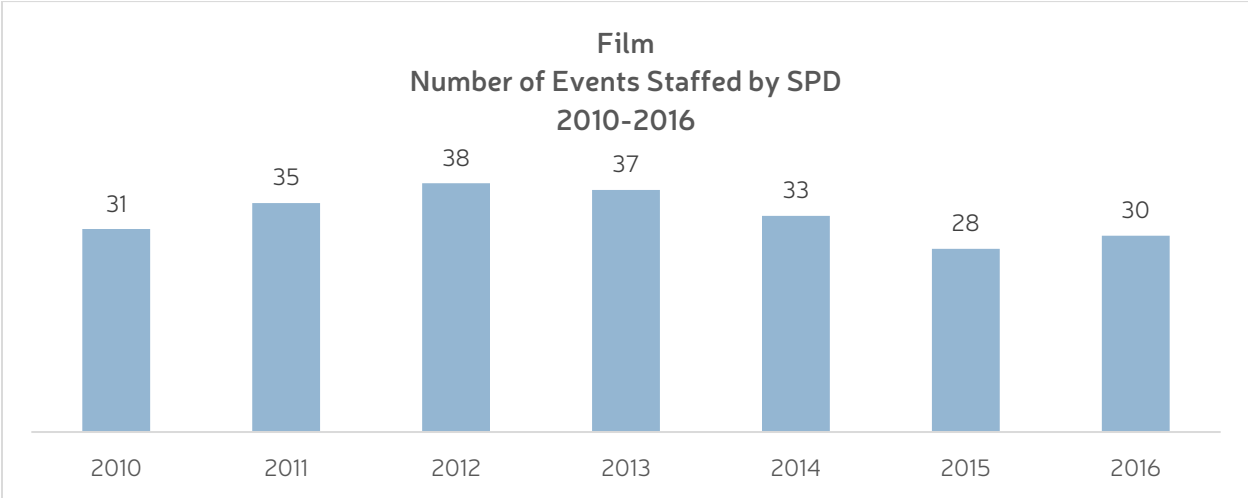
3. SPD Event Emphasis

This category Includes SPD’s special event emphasis work that was coded to an event Activity ID. Event emphasis patrols are additional patrols needed outside the perimeter of a special event due to increased security risk in the area because of the event. **As we describe in Section 1, SPD emphasis hours and costs are not consistently tracked to events in SPD’s payroll system, as many emphasis hours are coded as regular police work rather than to an event-specific activity ID. As a result, the charts below do not accurately represent all SPD event-related emphasis work.**

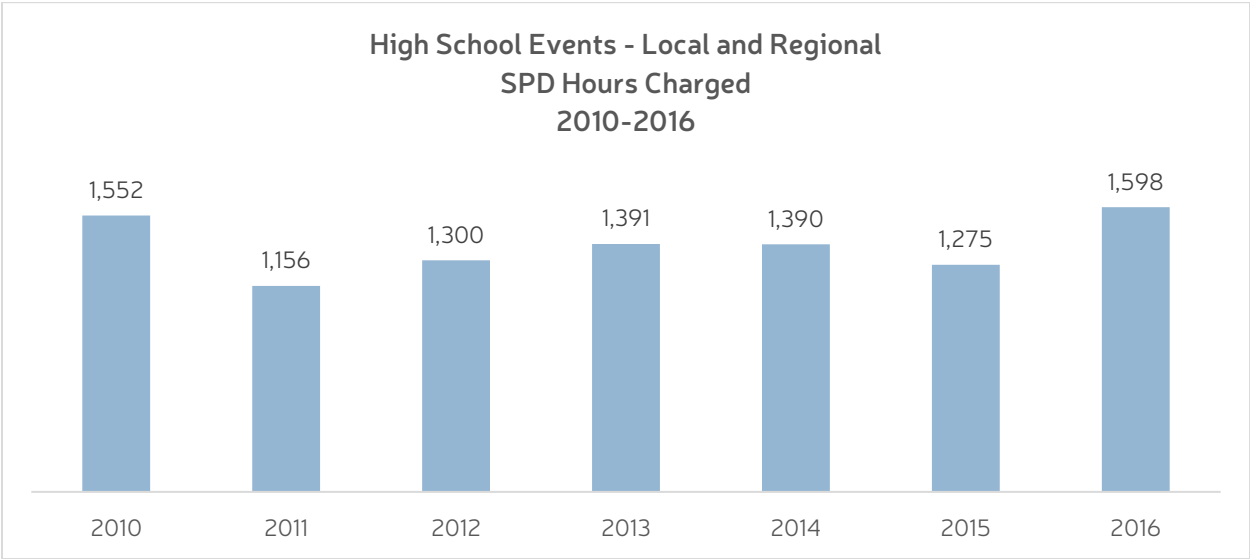
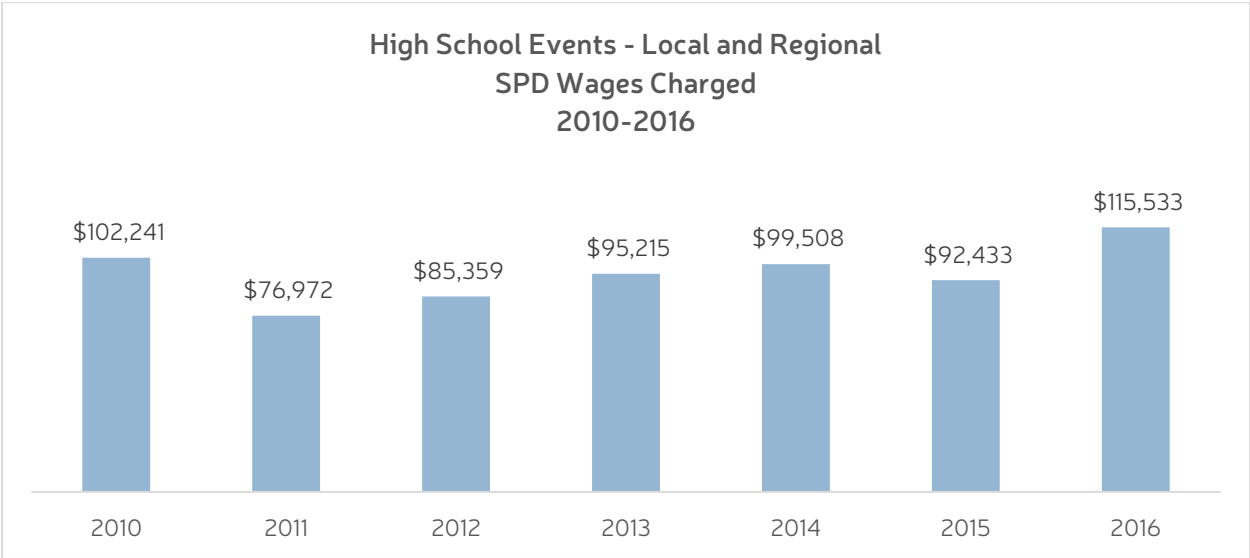
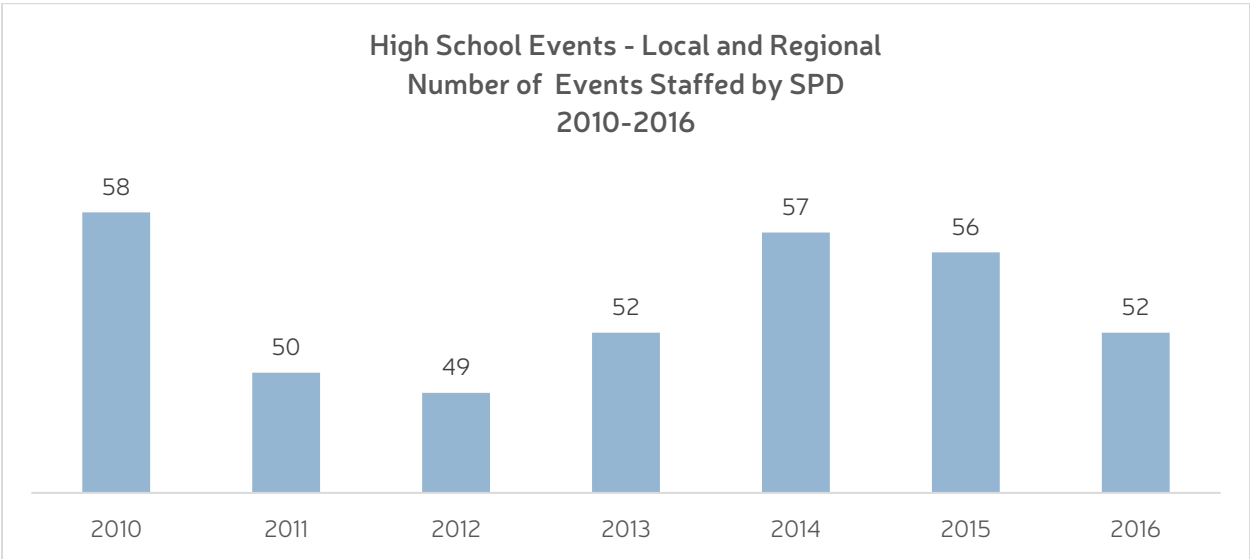


4. Film

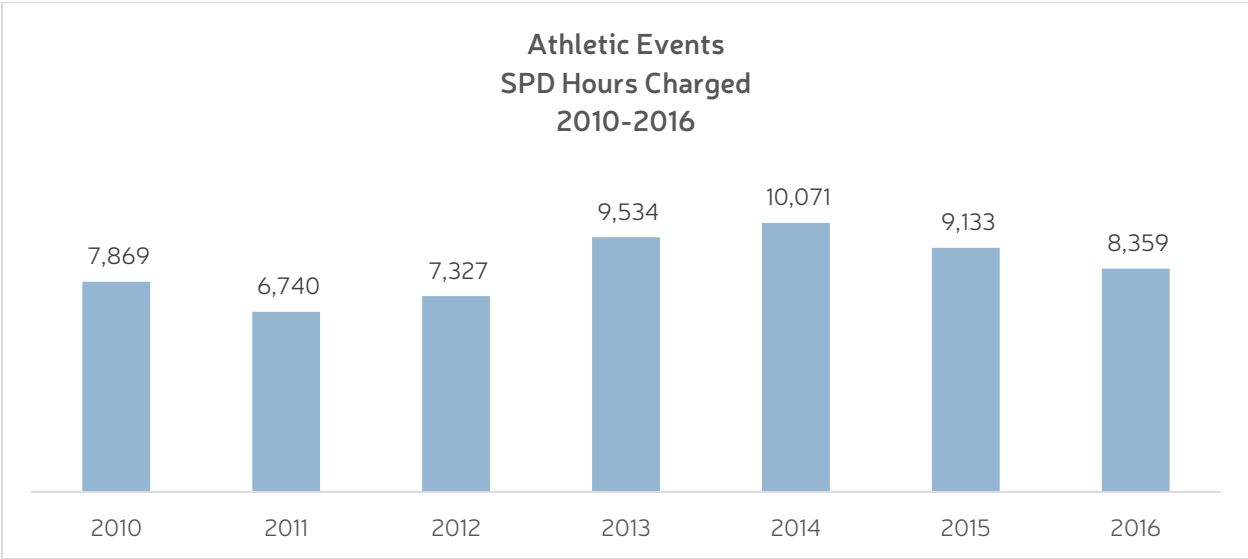
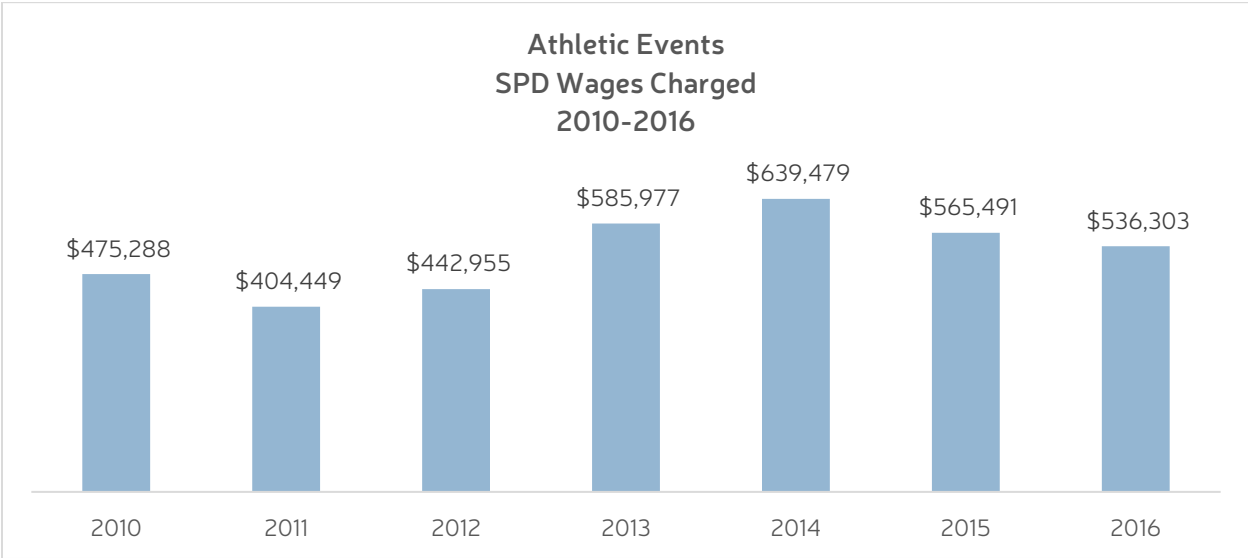
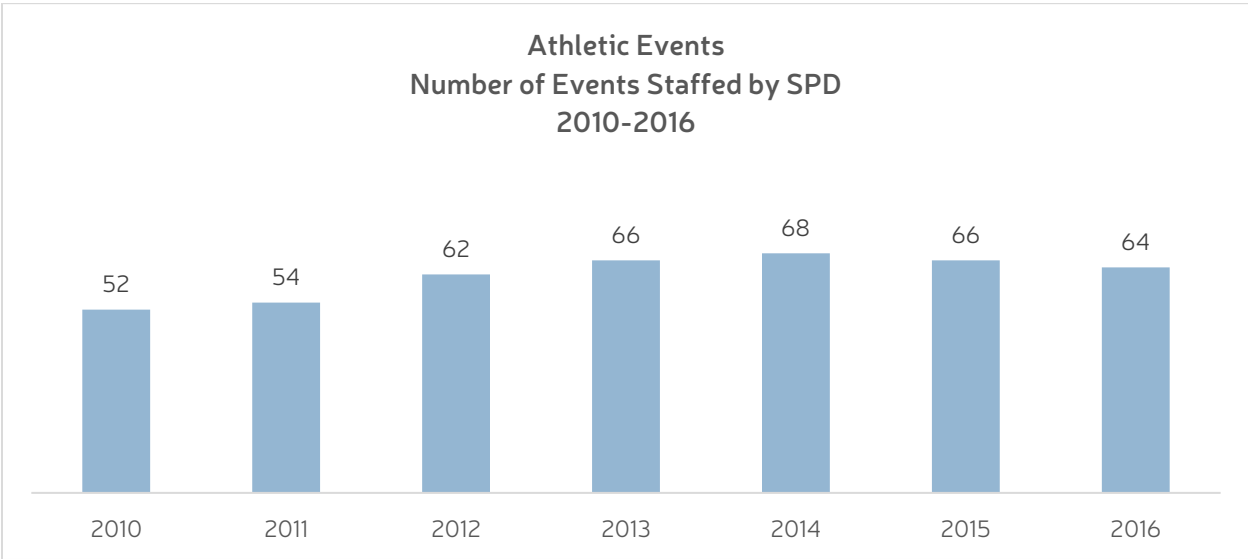
This category includes events staffed by SPD for events that obtain a Film Permit, such as filming a commercial. Film Permits are obtained through the Office of Film + Music within the Office of Economic Development.



5. High School Events – Local and Regional Events

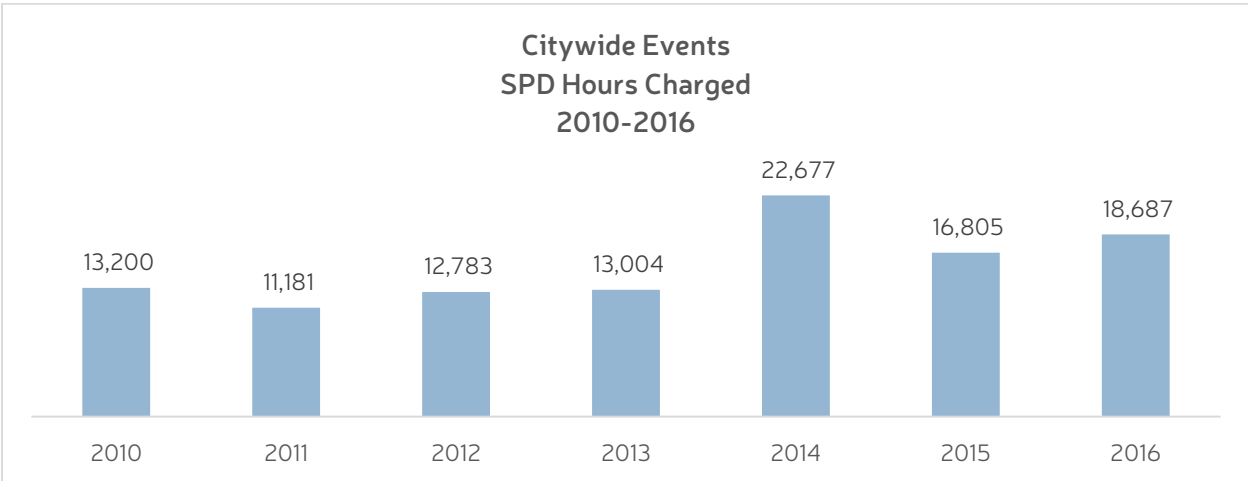
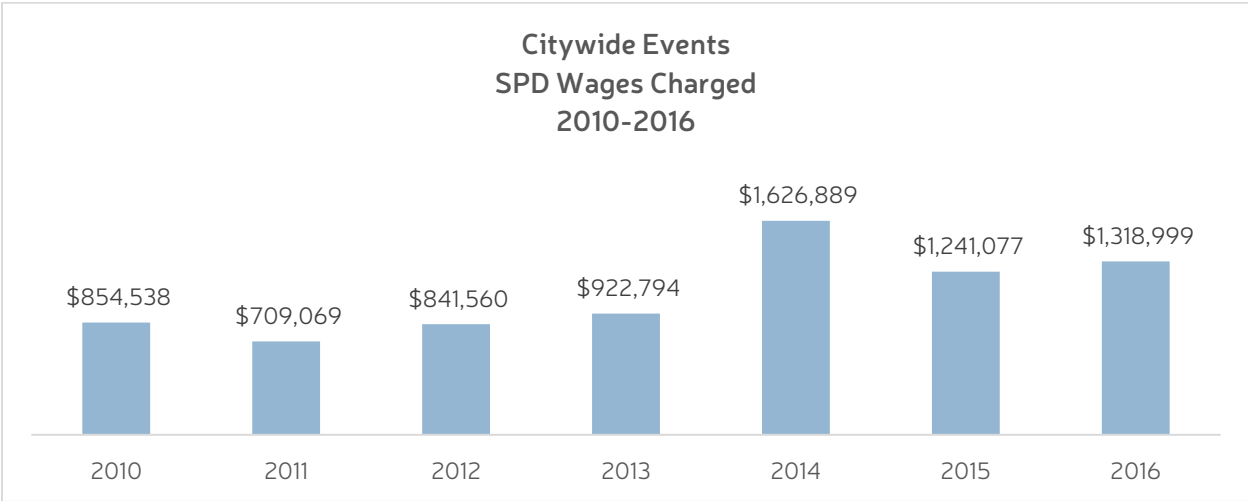
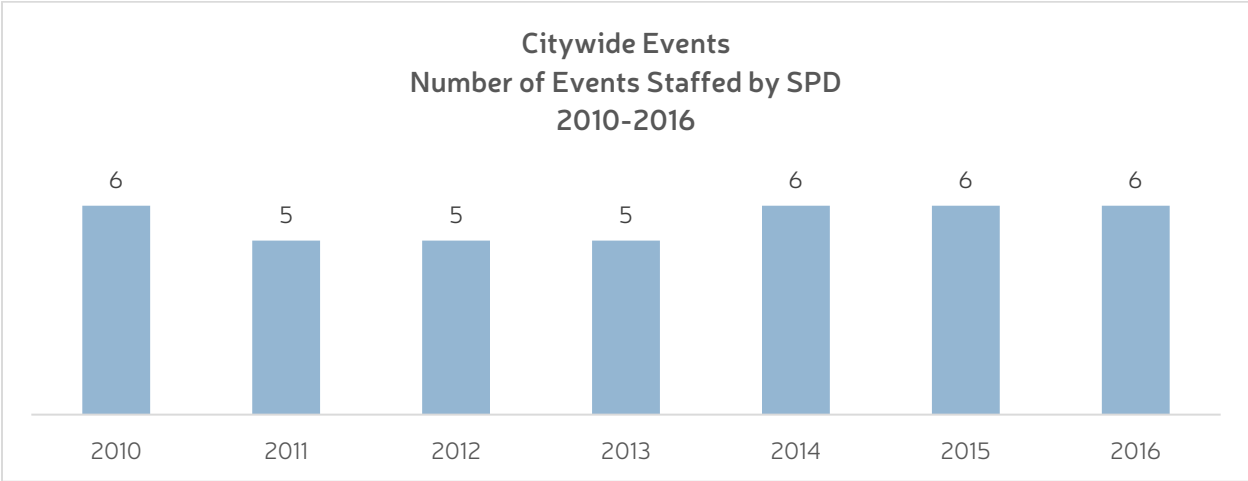


6. Athletic Events

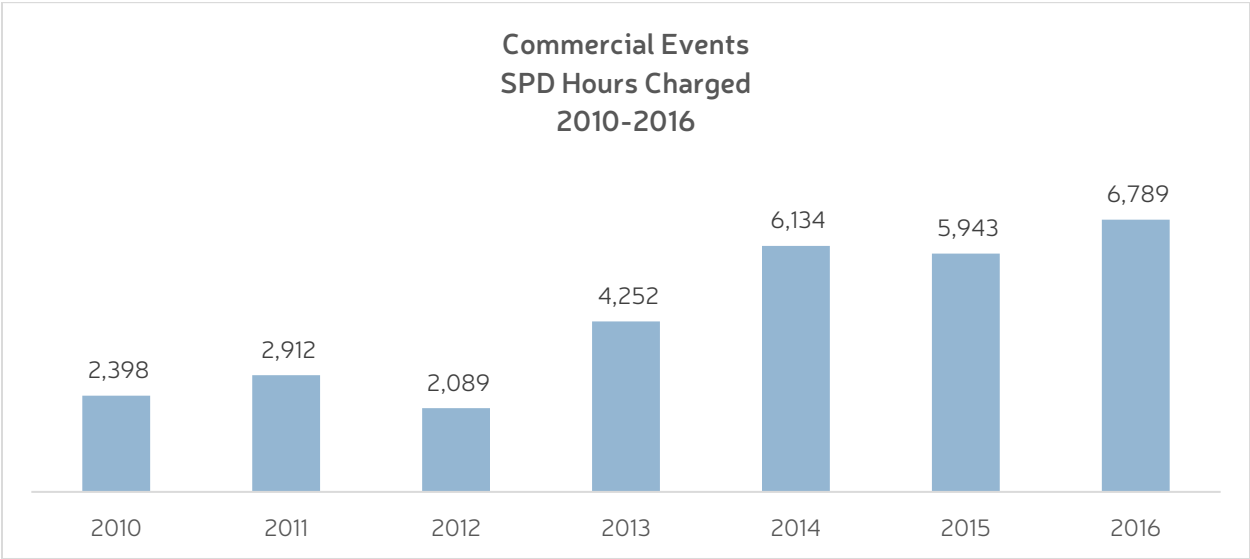
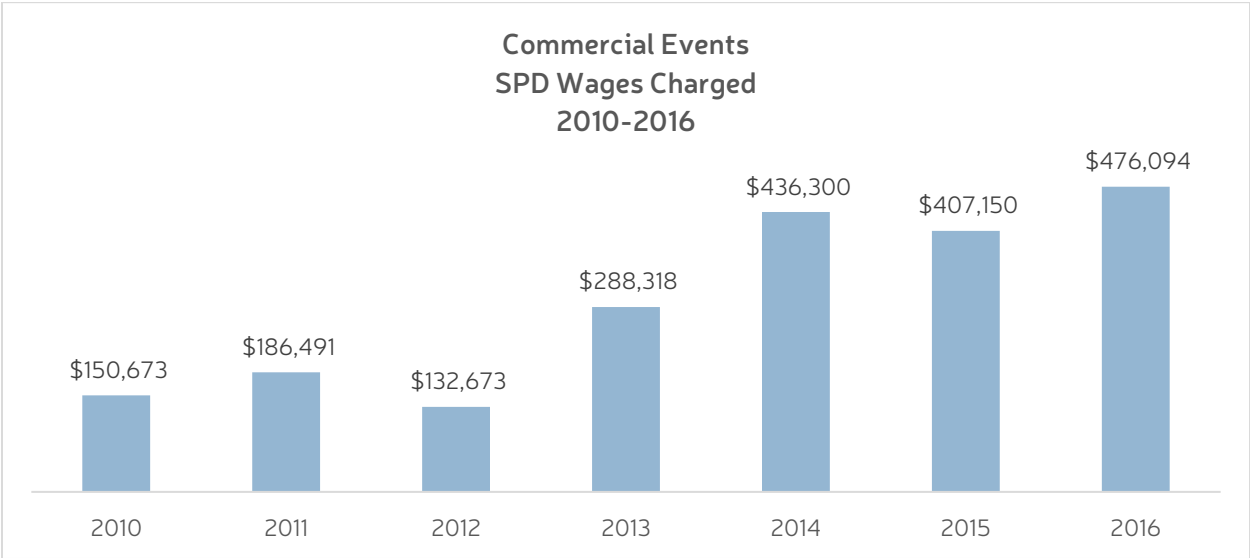
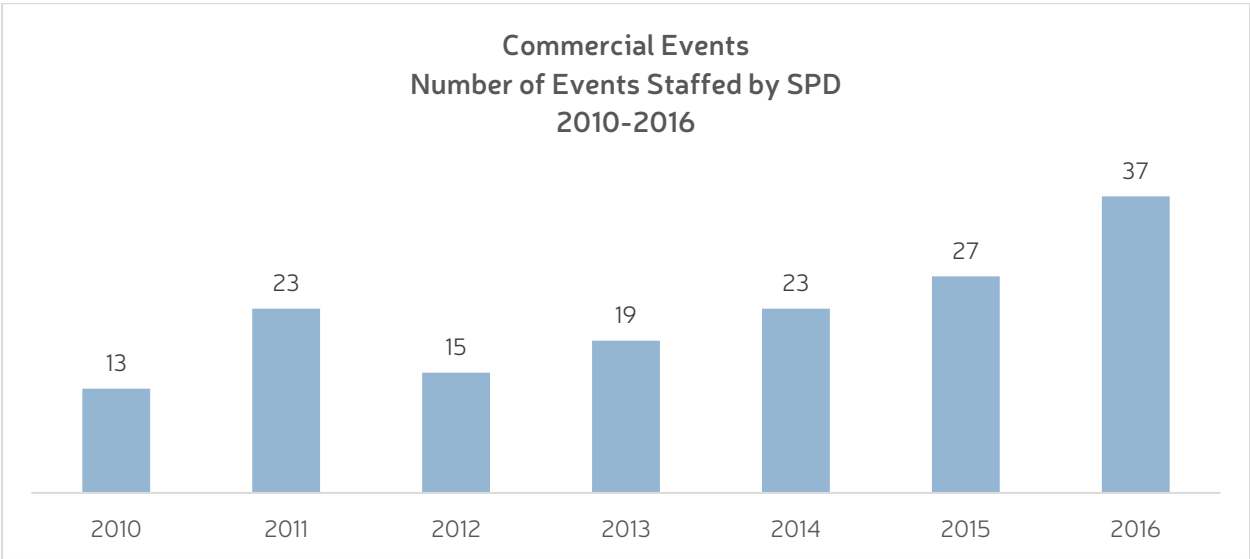


7. Citywide Events

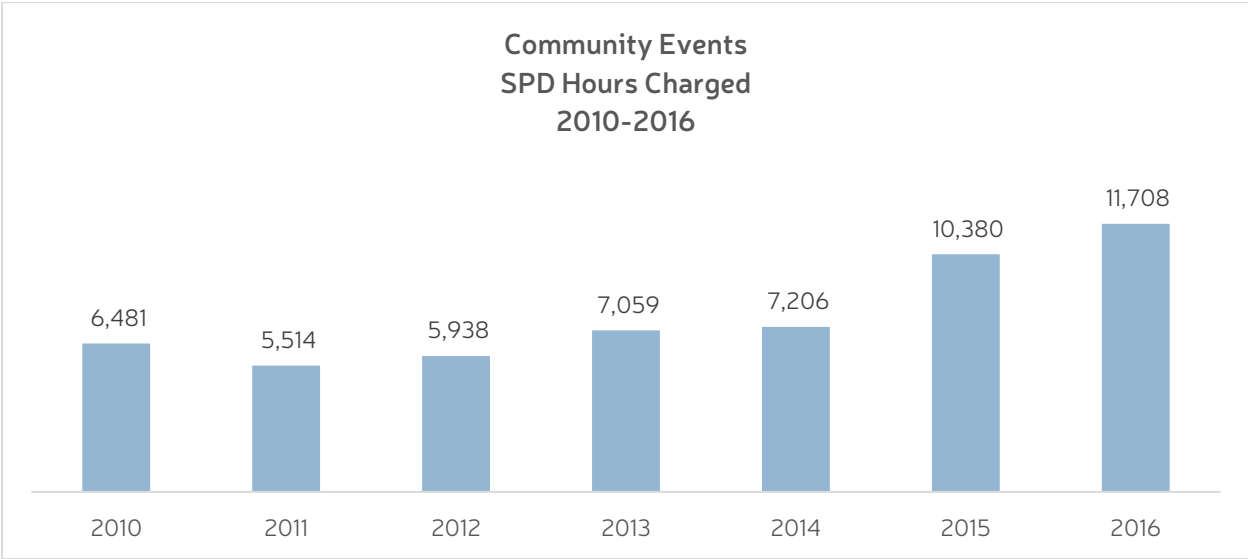
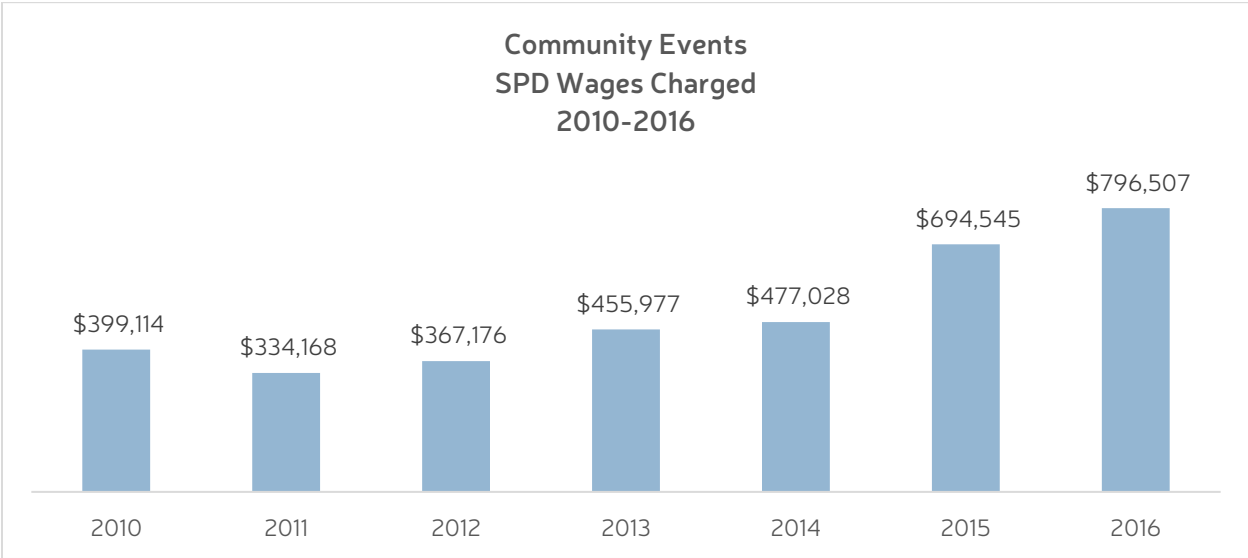
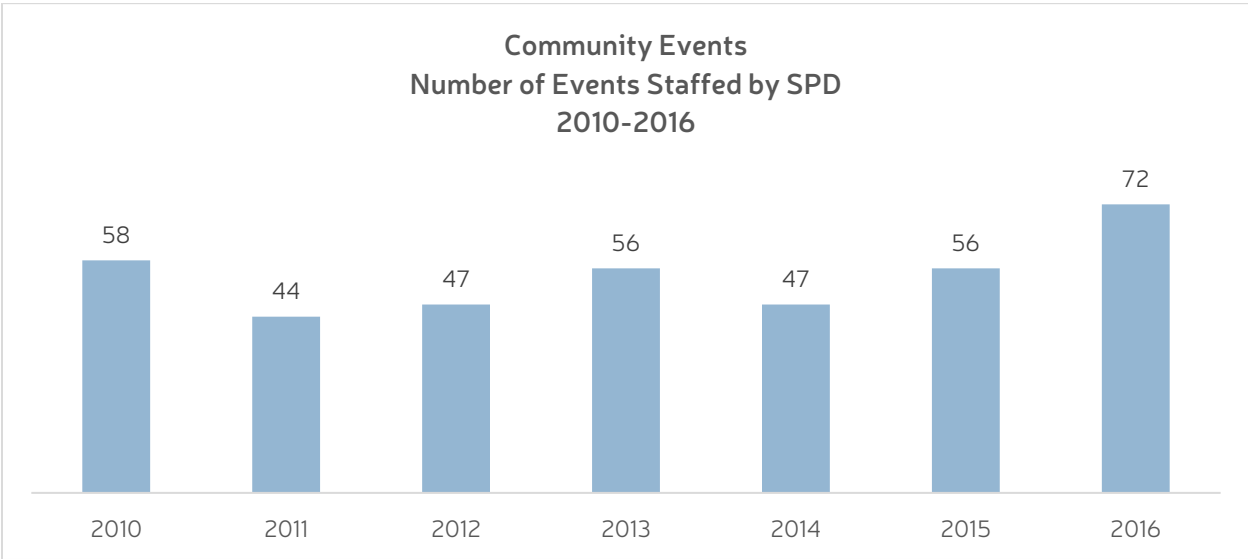
Citywide events include Seafair Weekend, Torchlight Parade, Family Fourth at Lake Union, Fremont Solstice Parade, Macy’s Holiday Parade, Super Bowl Parade, Seattle Storm Championship Parade, and the Sounders Championship March and Rally. We included the Seahawks Welcome Home Celebration in the 2015 number of events, wages, and hours, because hours and wages were charged for planning this event, even though the event did not occur.



8. Commercial Events

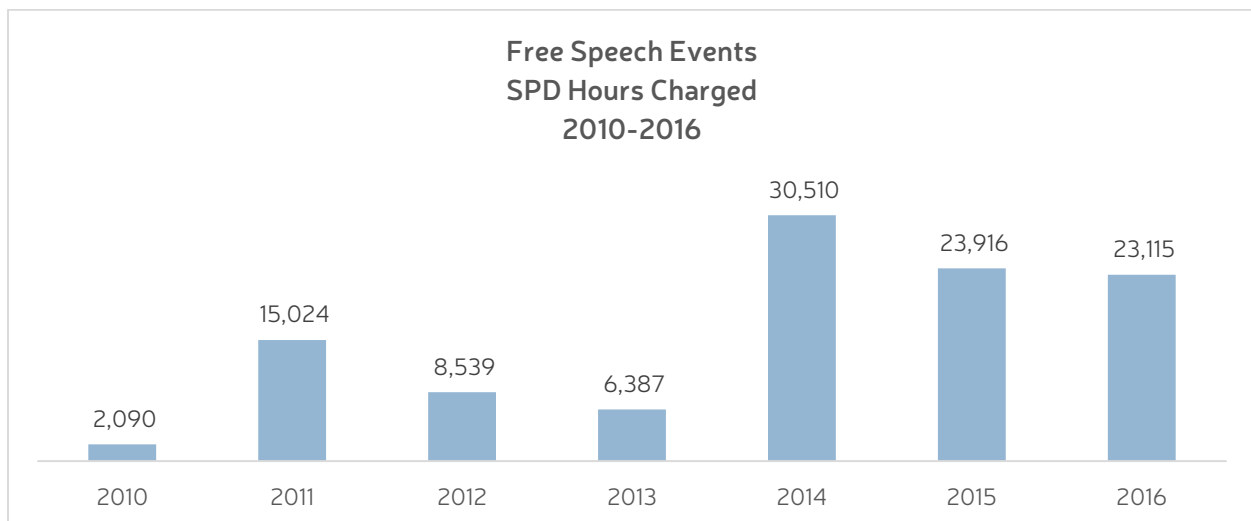
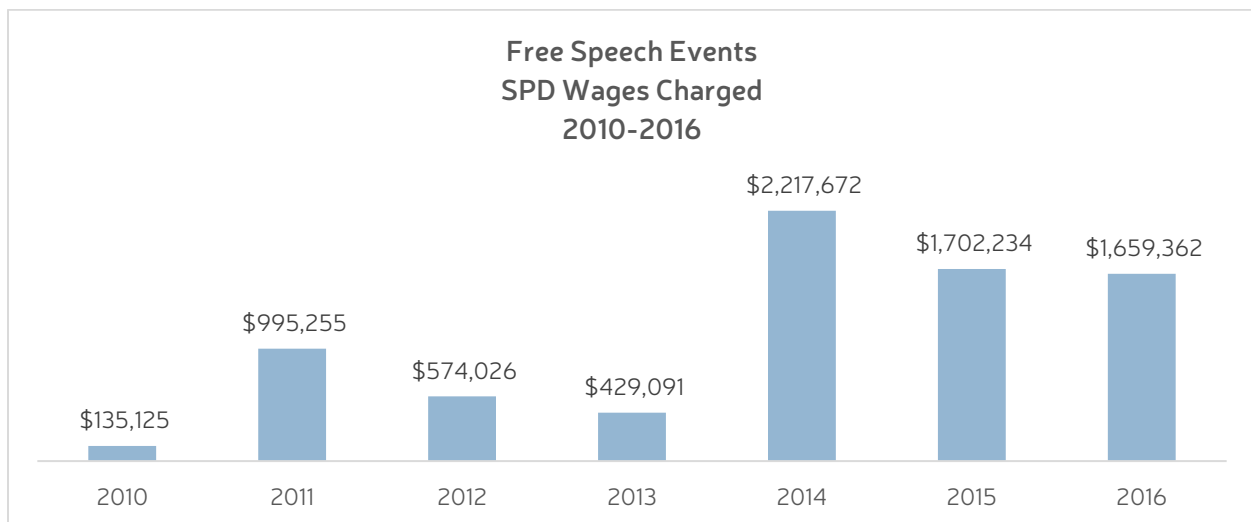
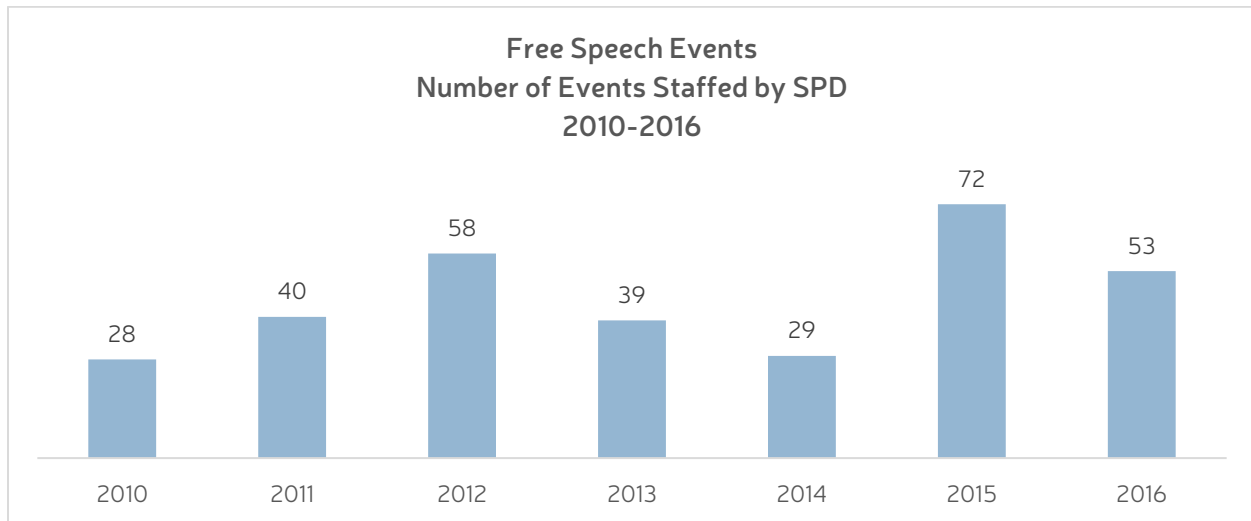


9. Community Events

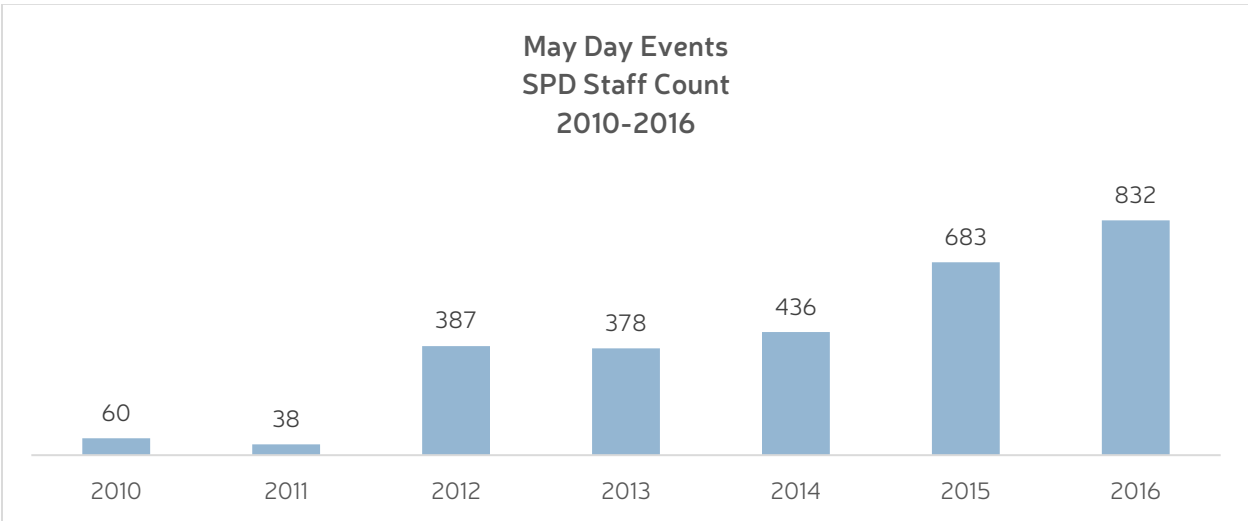
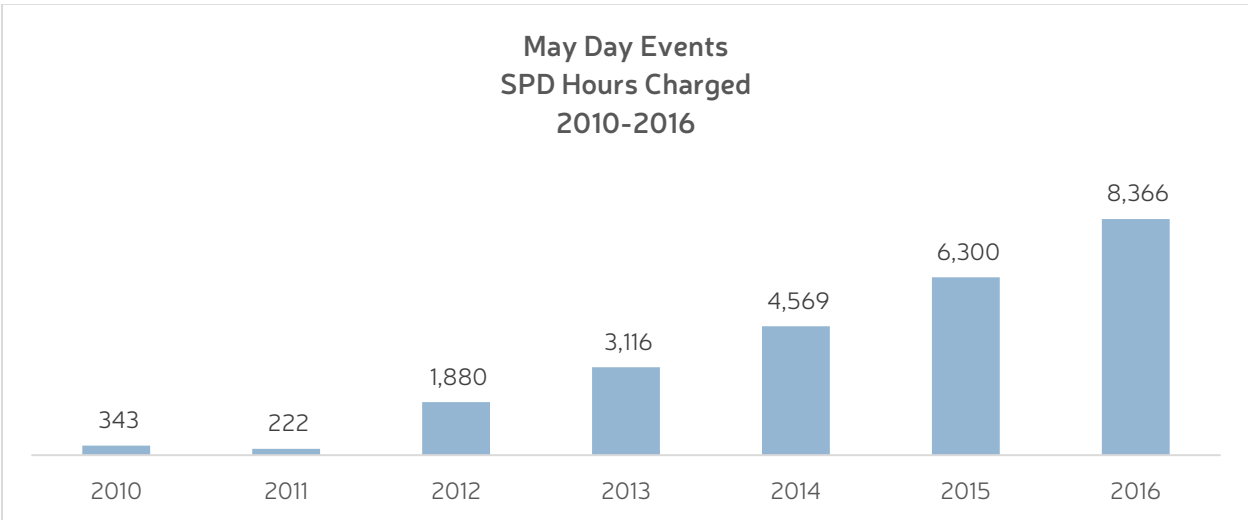
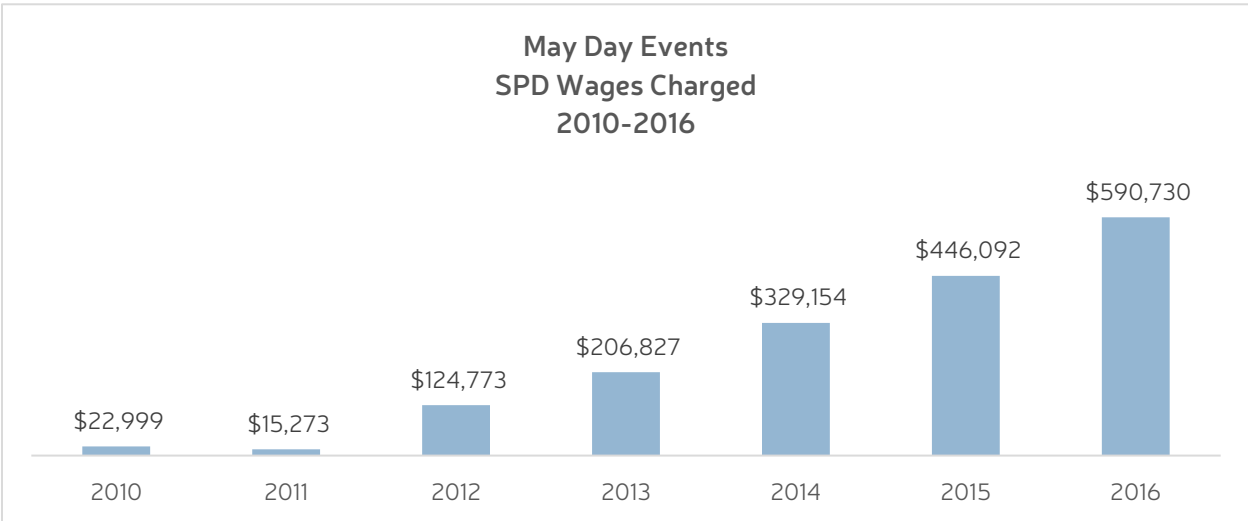


10. Free Speech Events

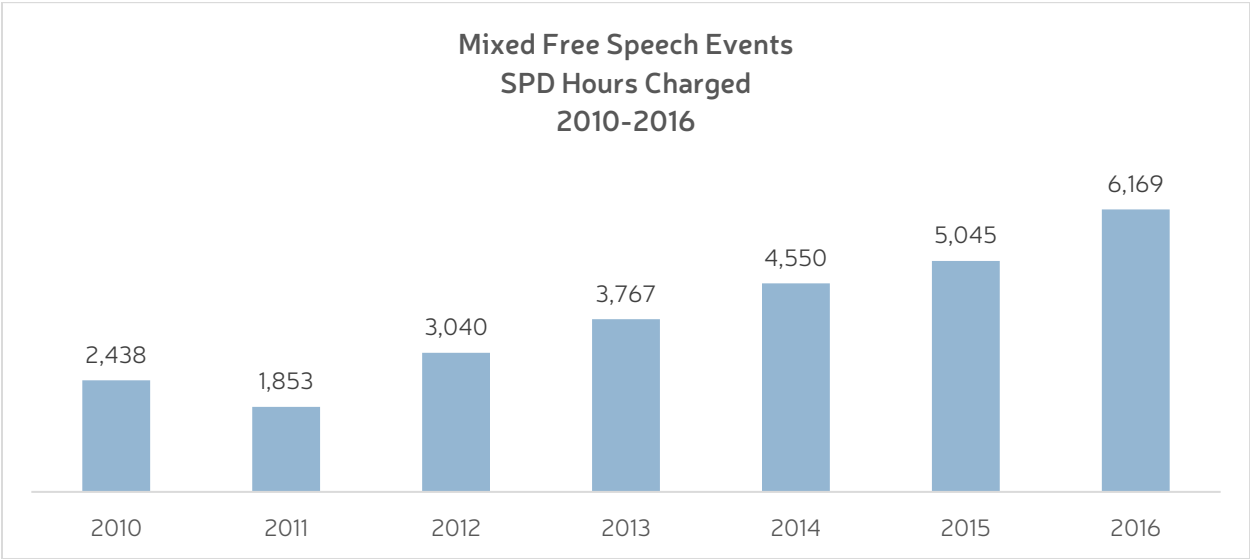
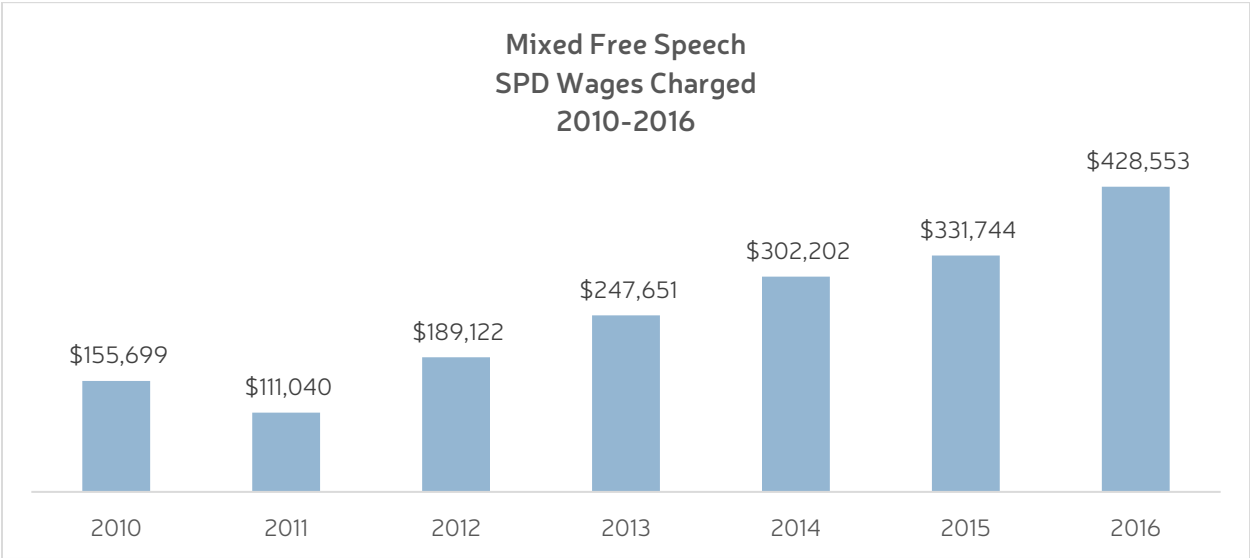
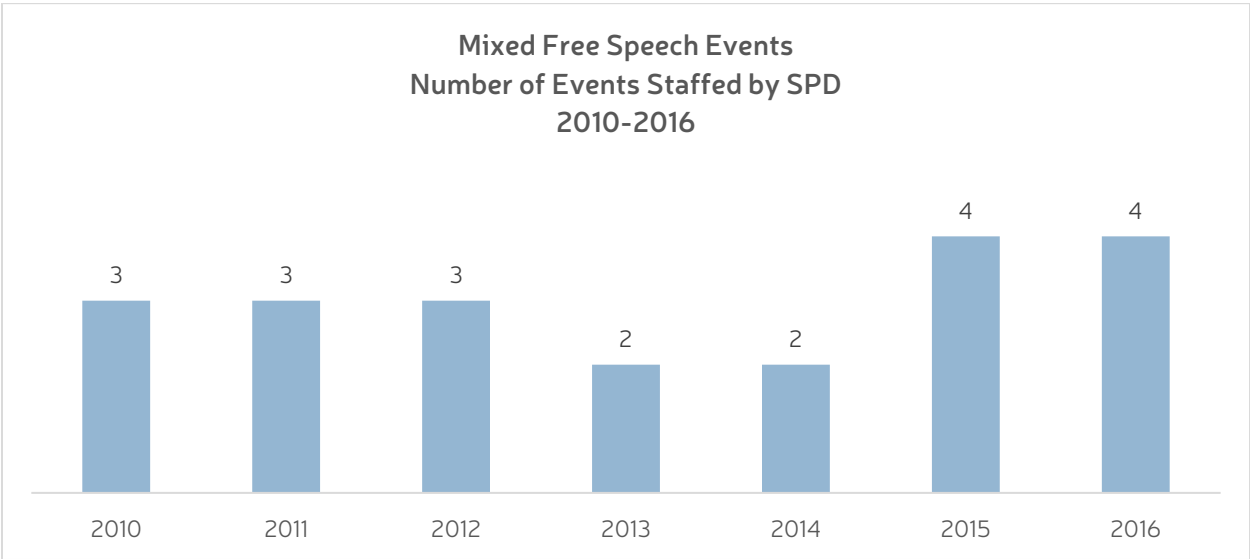
(Note: one 2014 Activity ID included multiple days of events related to the Ferguson Grand Jury findings.)



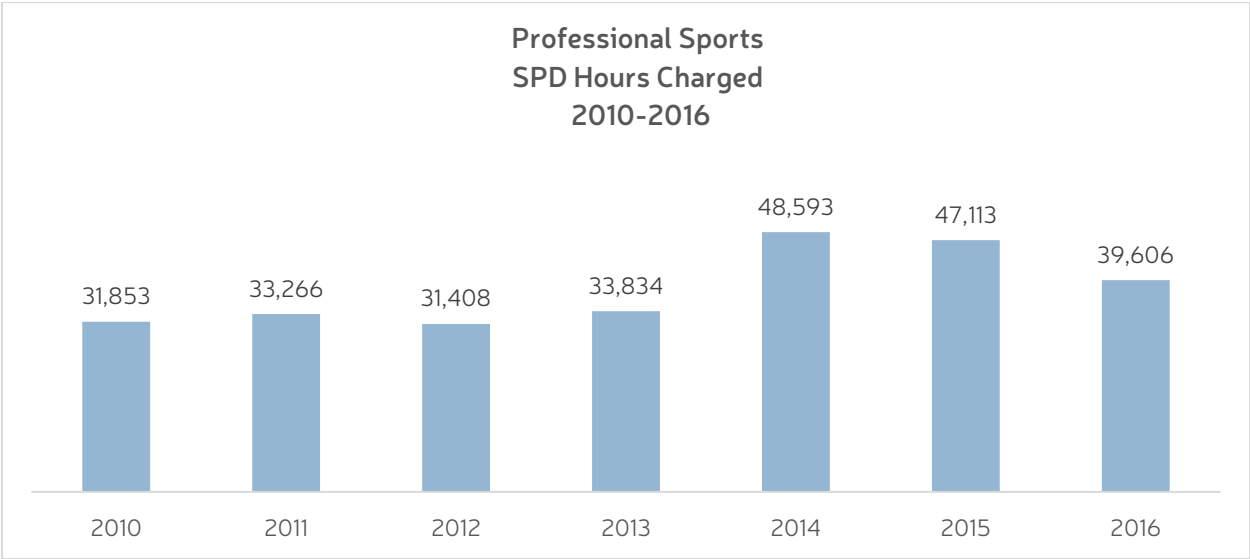
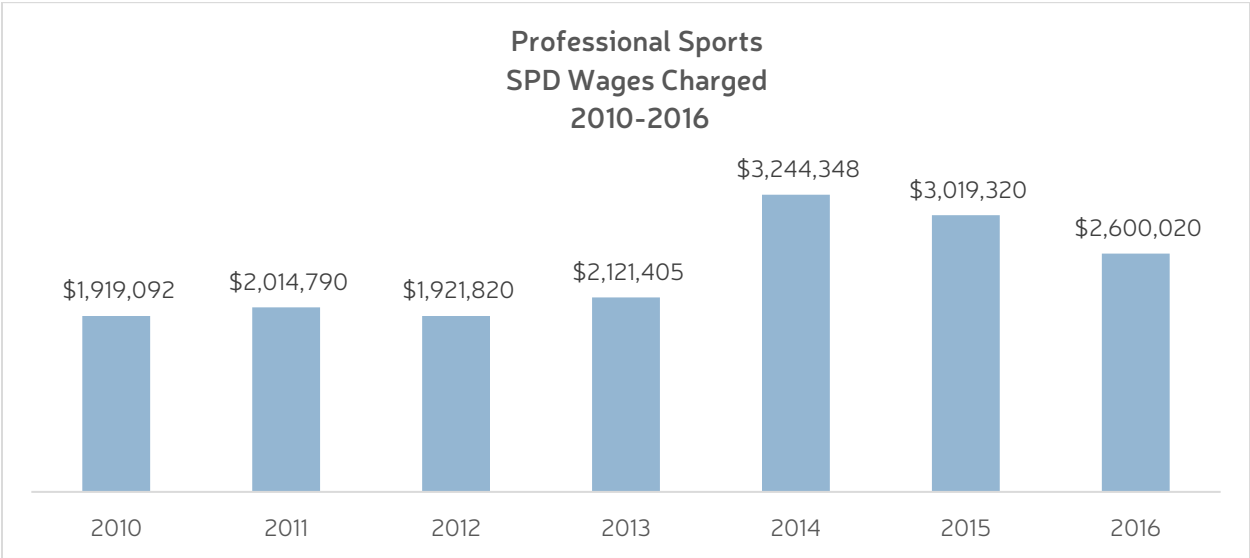
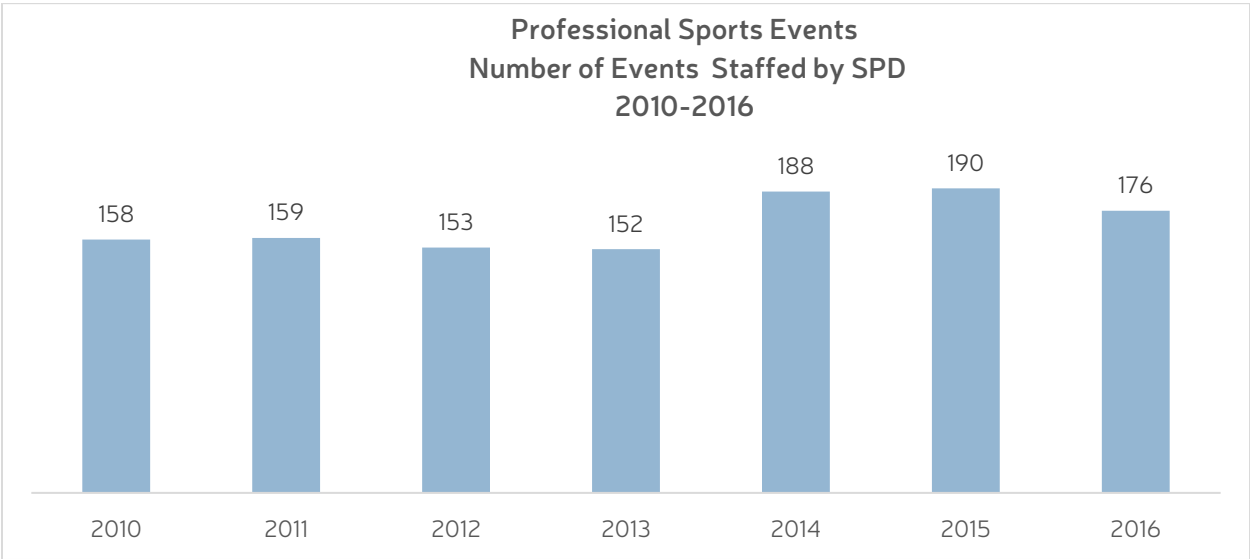
As an example of a Free Speech event, the exhibits below show the trend of increasing SPD resources used for May Day protests from 2010 through 2016:



11. Mixed Free Speech Events

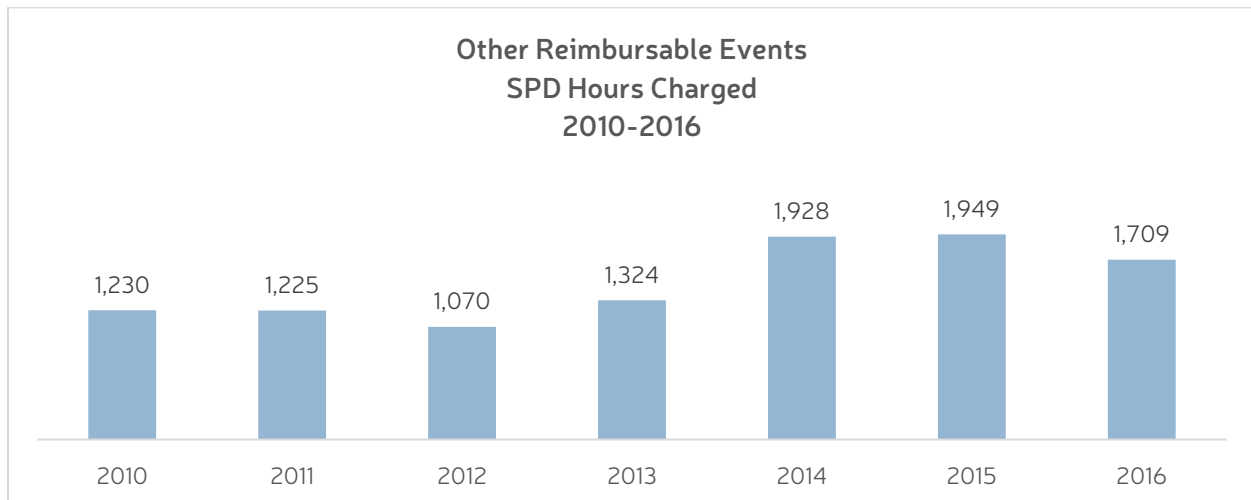
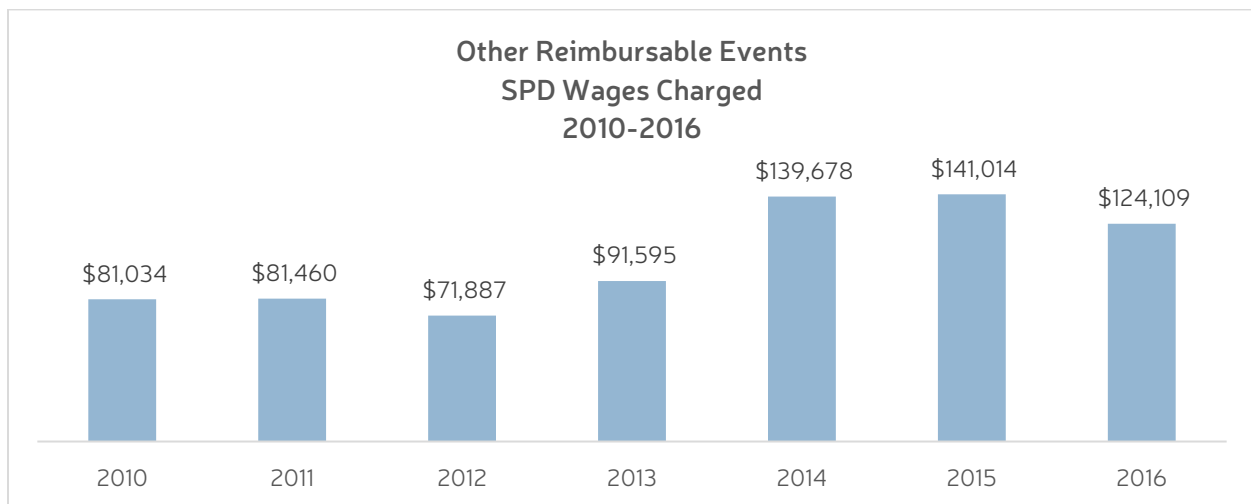
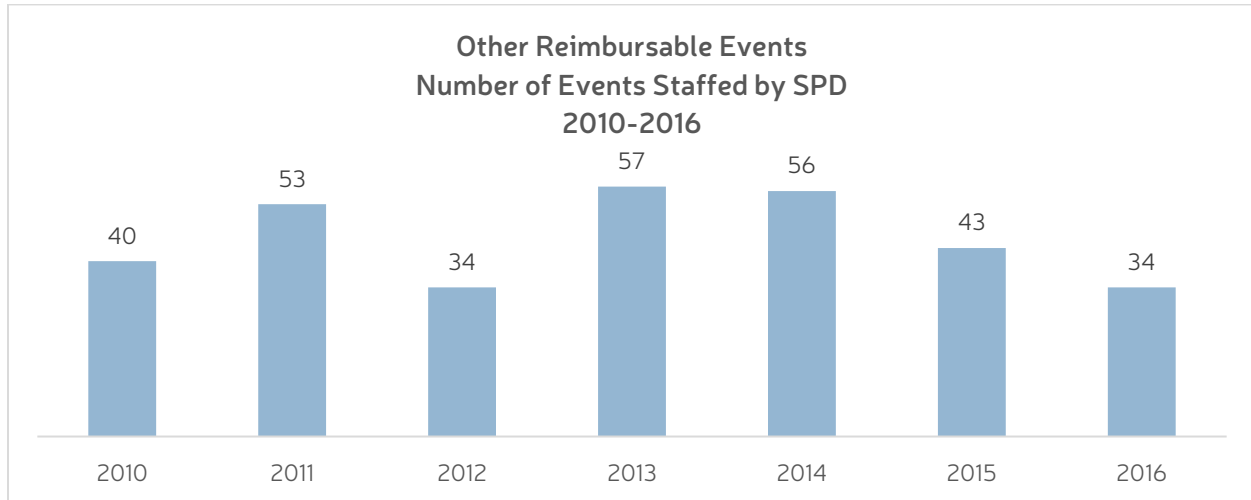


12. Professional Sports Events

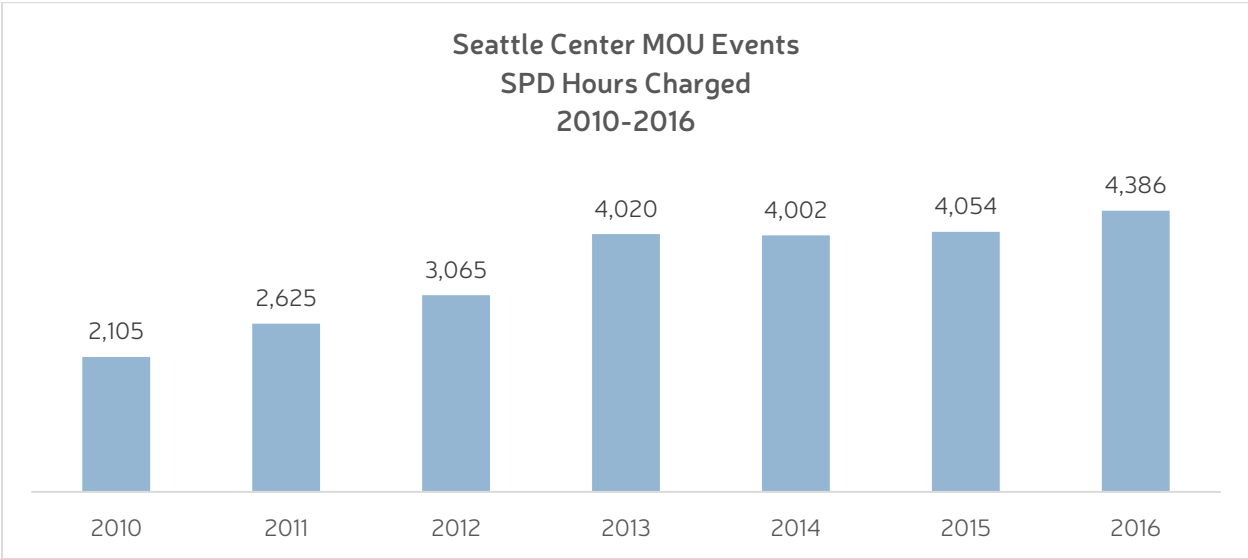
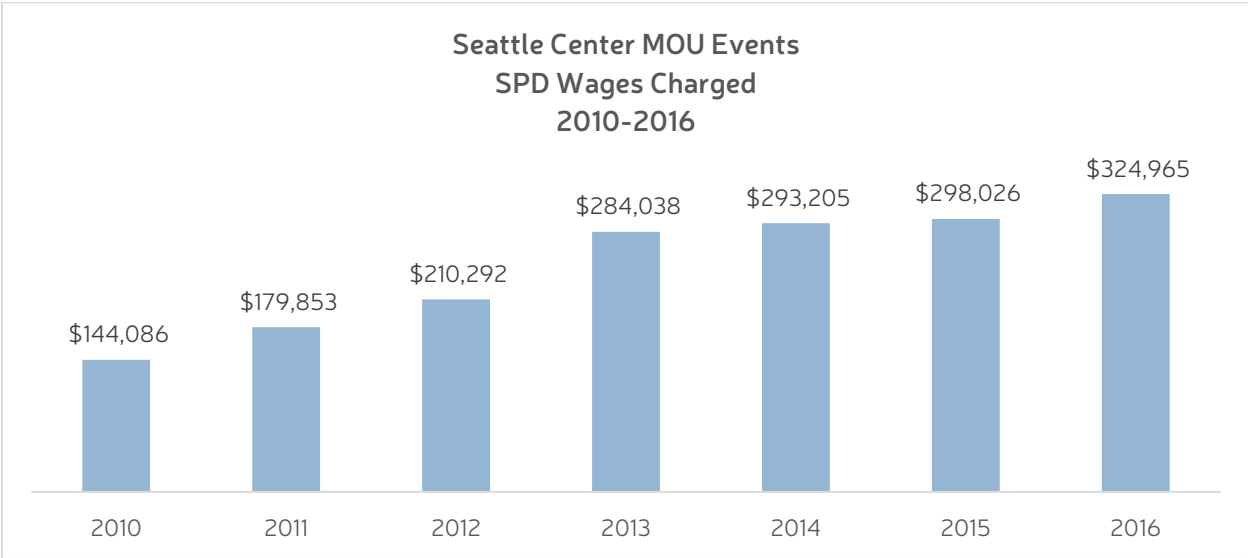
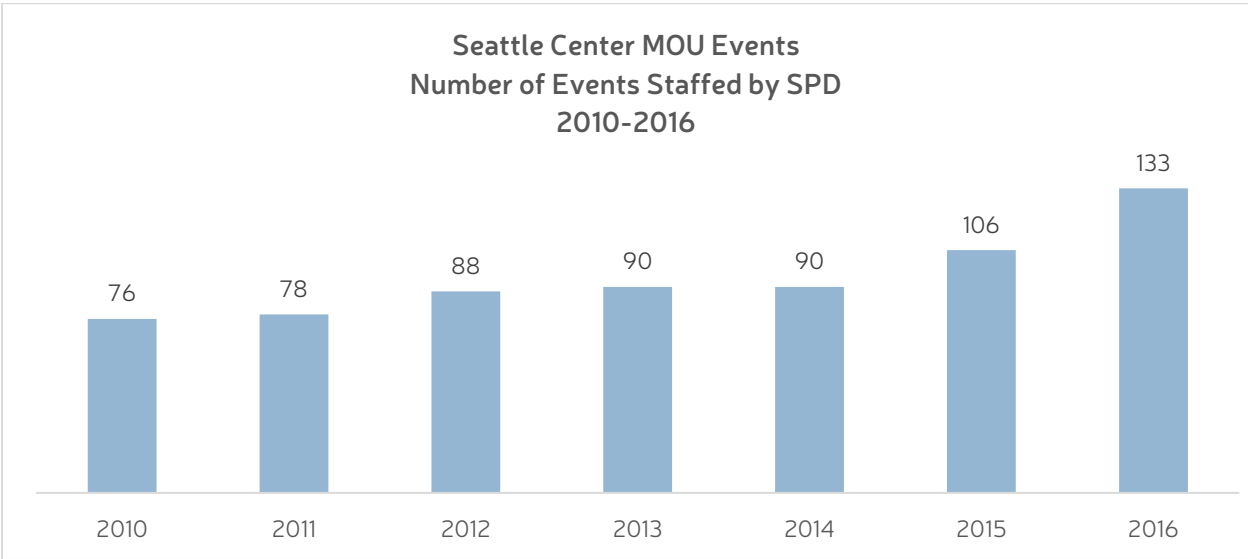


13. Other Reimbursable Events

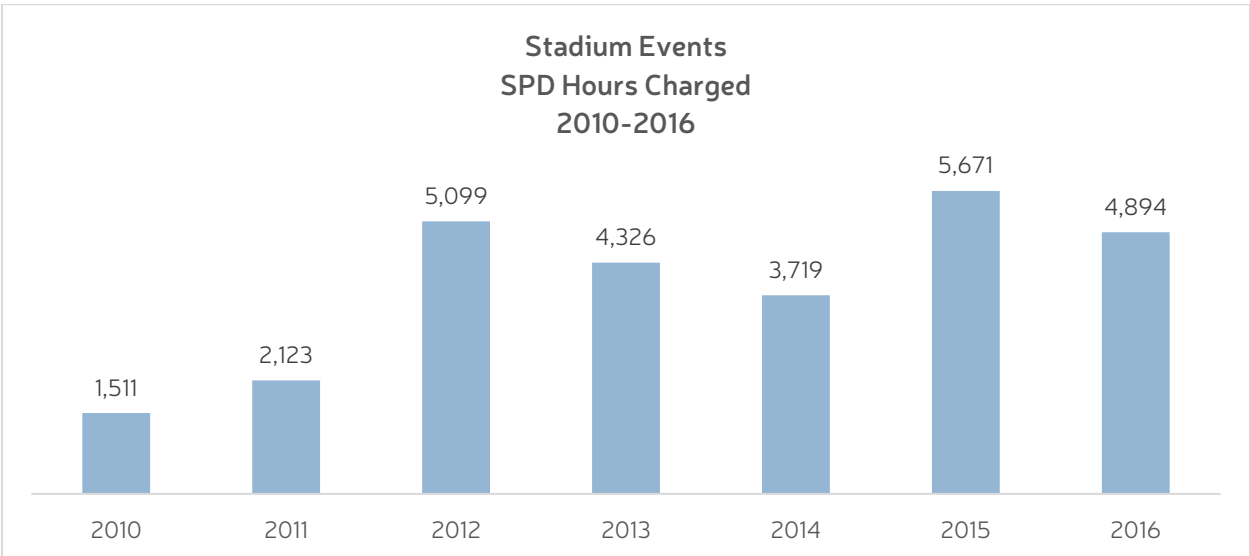
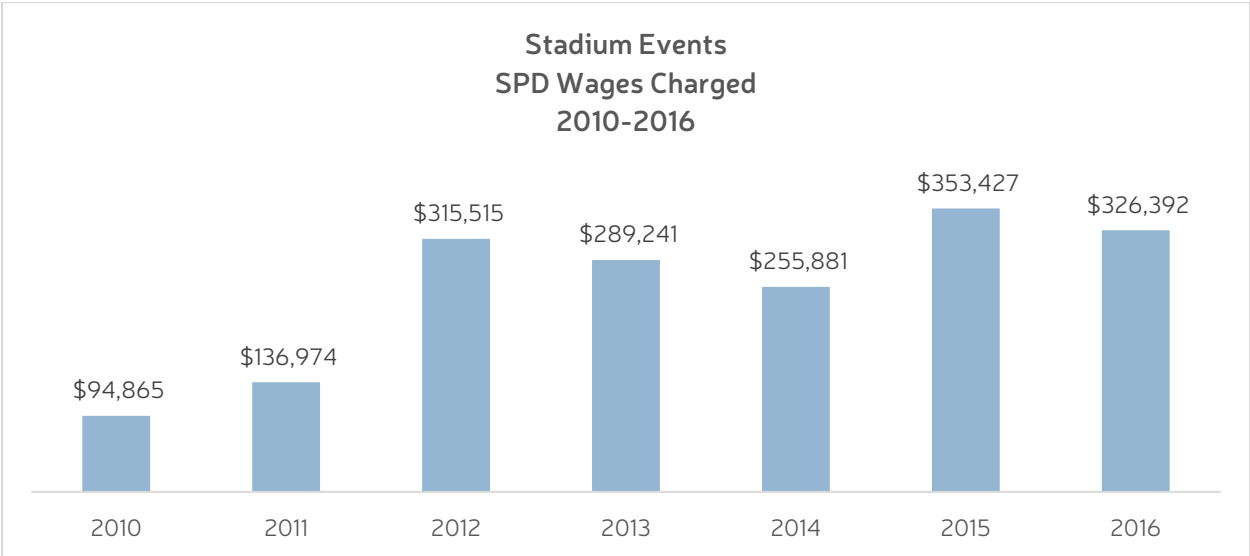
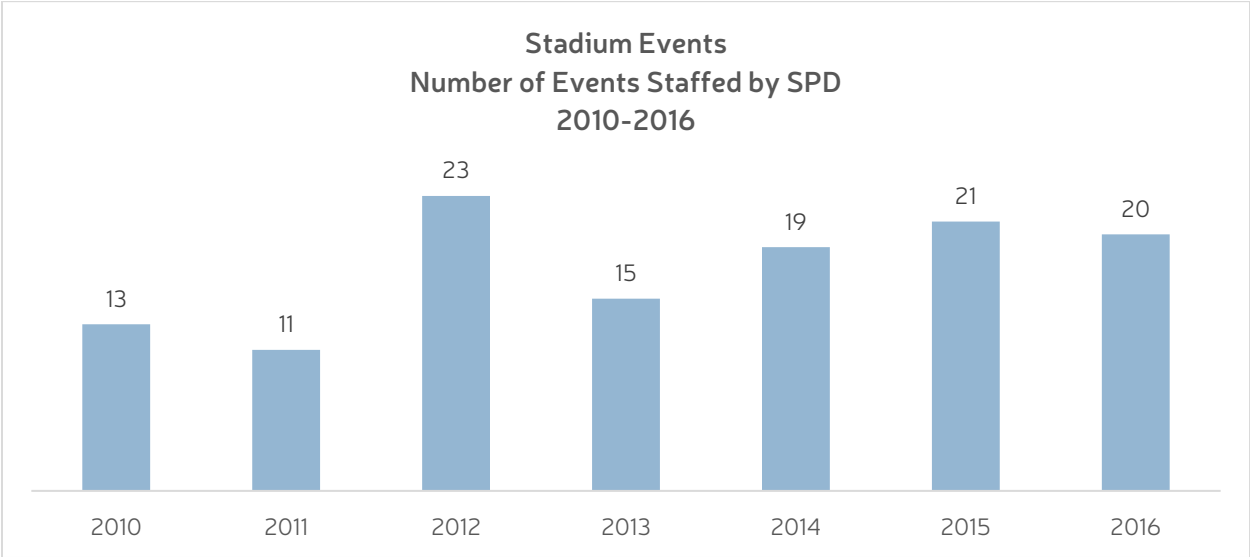
This category includes events coded as SCE, which have Memoranda of Understanding (MOU) between SPD and the event organizer; most of which are related to Seattle Center. The category also includes other miscellaneous reimbursable events that could not be categorized under other event categories (e.g., Tech Ed Microsoft, Bubbling Brown Sugar, Hunts Point Private Fireworks Show, Imagine Cup).



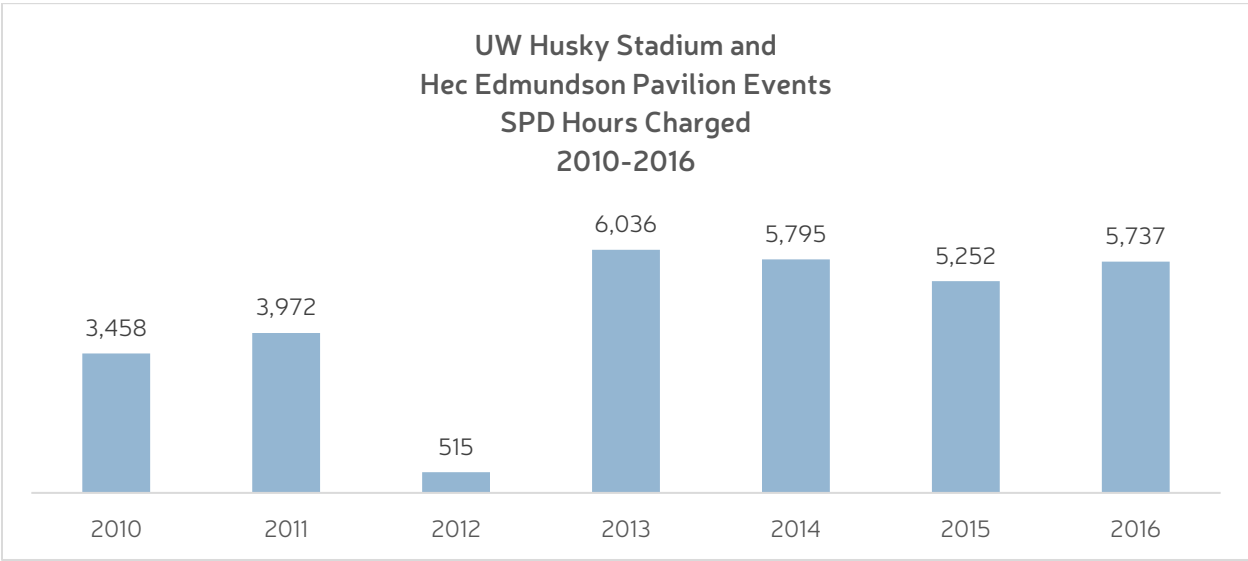
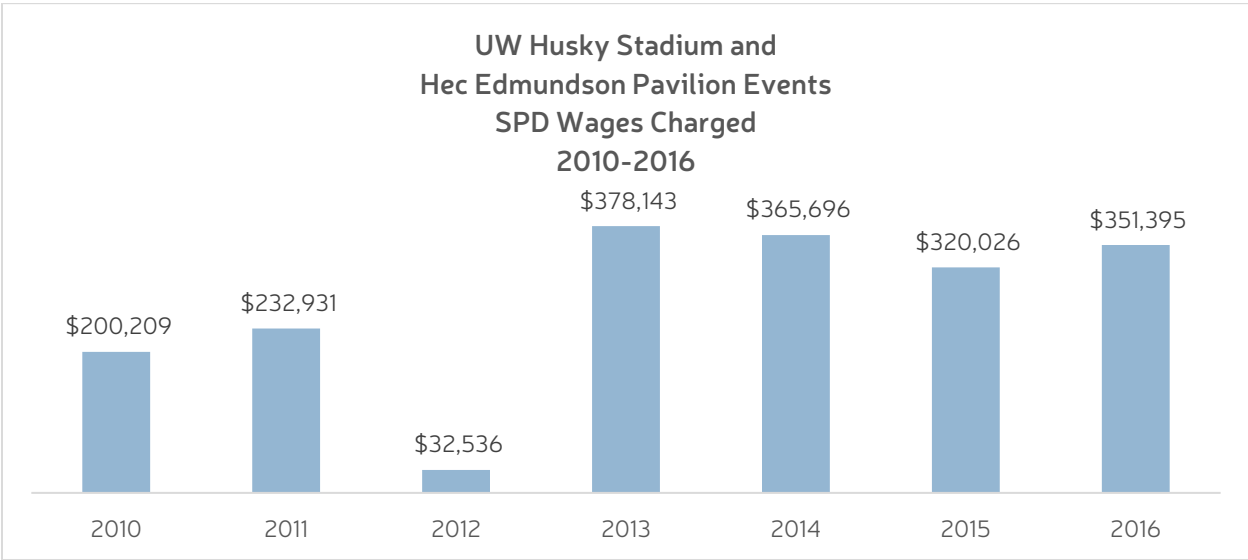
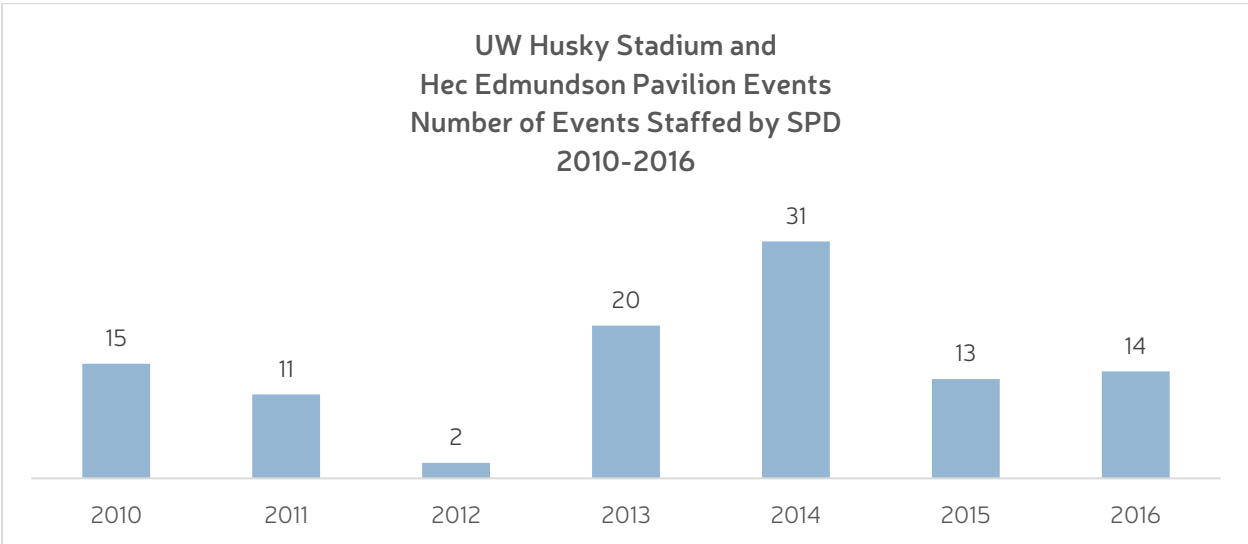
14. Seattle Center MOU Events



15. Stadium (Safeco/ Century Link/ WAMU Theater/ etc.) Events



16. UW Husky Stadium and Hec Edmundson Pavilion Events



APPENDIX C

Special Event Staffing Analysis – Technical Appendix

This appendix includes a brief overview of SPD's processes for determining police staffing levels at special events and describes how we conducted our assessment of these processes.

Background

In 2016, SPD staffed 724 events with sworn and civilian personnel. Special Events staffing is the largest driver of overtime in SPD, accounting for 145,771 hours of overtime in 2016. In addition to being a primary driver of expenditures, special event staffing decisions also affect public and officer safety and law enforcement capabilities both at the event and throughout the city. As a result, in planning for special events, SPD personnel must balance planning for worst-case scenarios with preparing to handle routine events and ordinary incidents. Further, they must balance the need for security at the event with ensuring events are not needlessly costly and do not jeopardize the availability of essential police services in other parts of the city.

Who Determines Staffing Levels for Special Events?

Decisions about the number of officers necessary for special events are made by personnel with varying levels of experience and at varying levels of the SPD organization.

Large or Complex Events: When an event will involve officers from multiple precincts or will span multiple shifts, an SPD Incident Commander is responsible for the event's command and operations elements, and Seattle Police Operations Center (SPOC) personnel handle the planning, logistics, and administration preparations. For these events, the Incident Commander determines the needed tactics, staffing, and resources, and SPOC schedules the necessary staff, manages the logistics involved (e.g., transportation, meals, and medical provisions), and creates the formal written plan, the Incident Action Plan (IAP). Incident Commanders are selected by the Police Chief or an Assistant Chief, and they are generally Lieutenants or above in rank, who have extensive experience with large special events.

Precinct-Based Events: For smaller, precinct-based events, a single sergeant or officer may handle all elements of event planning, from identifying the event objectives and necessary staffing levels, to creating the written plan and scheduling the individual officers needed. The individuals we met with in this role had a range of experience in planning special events, from about a decade to under a year.

Traffic- or Harbor-Unit Events: Some events require officers predominantly from SPD's Traffic or Harbor Units. For example, many of the "moving events" in the City, such as parades, marathons, and fun runs, are policed primarily with officers in SPD's Traffic Unit. Events that take place in the City's lakes (e.g., swimming events, boat races, etc.) are similarly staffed mostly with officers from SPD's Harbor Unit. If an event is staffed primarily by officers in these units, a sergeant or lieutenant from the affected unit handles all elements of event planning, including determining the number of staff needed.

Small MOU-Reimbursable Events: Some events do not require a permit, but the event promoter still requests police services. For these events, the promoter contracts for services through an MOU with SPD. Examples of these types of events include corporate "all hands" or shareholder meetings in which a large number of people will be attending a private event, and scheduled officers facilitate the movement of

people and traffic and also provide event security. Staffing for these types of events are planned by the sergeant in the West Precinct who also manages all West-Precinct specific events and has been in this role for many years.

Seattle Center Events: SPD also provides traffic and security police services for many events each year at the Seattle Center. The large festivals at the Seattle Center are planned by an Incident Commander (see Large or Complex Events) and coordinated by SPOC personnel. The many smaller events at Key Arena and other Seattle Center venues are planned by the same West Precinct sergeant who plans West-Precinct and MOU-reimbursable events. In this case, the sergeant collaborates with event planners at the Seattle Center to determine the number of officers necessary for each event.

Professional Sports Events: Finally, SPD provides traffic control services outside professional sports games (e.g., Seahawks and Mariner games). Staffing for these events is set by the terms in an MOU and is based on attendance, and planning for these events is handled primarily by SPD's Traffic Unit.

What is SPD's Process for Determining Staffing Levels at Events?

As we discuss in the Event Planning and Staffing section of this report, although SPD has not documented the process event planners are expected to follow when determining how many staff are necessary at a special event, almost every individual we spoke with described a similar approach to determining the staffing for an event:

- **Review of Past Events:** All the planners we met with said that they start by reviewing an event's nature and history. They look at staffing plans from past years and any documented after action reviews. If the event hasn't occurred before, they research similar events or contact another jurisdiction with experience with this type of event.
- **Review Event Details:** Then they update past plans with current year details, such as changes to the venue or route, expected attendance, event hours, whether live music will be presented or alcohol will be sold, and the role of volunteers. When necessary, they consider possible weather scenarios or aspects of the location or timing that could make an event particularly risky.
- **Assess Risk:** Given what they know about the event and information from SPD's intelligence unit, they identify threats and risks related to the event, and they plan for potential contingencies as much as possible.
- **Develop Draft Staffing Plan:** After considering past events and current risks, event planners develop their suggested staffing plan. SPD does not have any models or guides that planners can rely on to determine how many officers are necessary—they develop event plans on an event-by-event basis. From our research into best practices and discussions with other jurisdictions, this is not unusual. The best practice criteria we reviewed and staffing professionals we interviewed concurred that staffing decisions are based on professional judgement, as they must reflect variables that are unique to each event.

SPD follows many of the established best practices we learned about during our research. For example, they staff events using squads, each with a clear chain of command, and the planners we interviewed consistently described weighing the criteria specified by best practices as the most important to consider (e.g., the nature and history of the event, details of the venue and route, and the latest intelligence information).

- **Review and Approval:** SPD personnel who plan events for the precincts or units communicate their plan to their chain of command (e.g., precinct management) for approval, and, as of 2016, they also propose their general staffing approach at the weekly SPOC meeting. At the SPOC meeting, proposed staffing levels are discussed, revised if necessary, and approved verbally by the Captain or Assistant Chief who manages SPOC. Staffing decisions for large events, which are made by an assigned Incident Commander, are reviewed by SPOC and often by SPD Command Staff.
- **Final Plan Creation and Staff Scheduling:** Once a staffing level has been approved at the weekly SPOC meeting, the event planner finalizes the event plan. This often means that they draft a formal Incident Action Plan or Operations Orders, although some precincts rely on less formal plans for smaller events.
- **After Action Analysis:** The final step to managing special events occurs after the event has ended. After action reports document what activities occurred, critique event operations, and make recommendations for future events. The SPD personnel we spoke with all emphasized the importance of experience with previous events when planning staffing for a current event, and many said they document notes about the adequacy of staffing in after action reports when it is appropriate.

Depending on the nature of the event and its history, the planning process may take months and may involve multiple meetings with the event promoters and coordination with other City departments (e.g., Transportation, Parks, Fire). Alternatively, for simpler events, planning may entail a simple adjustment to last year's plan.

Scope and Methodology

We assessed SPD's current process for determining police staffing levels at special events by comparing SPD's processes with federal guidelines and best practices and with processes implemented by other jurisdictions.

To identify criteria for assessing SPD's processes for planning and staffing special events, we conducted the following audit work.

- **Best Practice Review:** For best practice criteria, we relied primarily on two documents published by the U.S. Department of Justice (DOJ). The first, *Planning and Managing Security for Major Special Events: Guidelines for Law Enforcement*, was prepared in 2007 for the Office of Community Oriented Policing Services at the U.S. DOJ. The second, *Managing Large-Scale Security Events: A Planning Primer for Local Law Enforcement Agencies*, was developed by the Bureau of Justice Assistance in 2013 to be a comprehensive planning guide that captured model practices and lessons learned in all aspects of security planning and operations for large-scale security events. In addition to reviewing these two documents, we also conducted a literature search for additional online materials and we interviewed Edward Connors (with the non-profit Institute for Law and Justice and the principal author of the 2007 DOJ report above).
- **Incident Command System Criteria:** When planning police services at special events, SPD follows the Incident Command System (ICS) developed by the Federal Emergency Management Agency (FEMA). FEMA designed ICS to be a standardized incident management tool for use by all levels of government (e.g., federal, state, and local) when responding to a broad spectrum of incidents or situations (e.g., scheduled events, unannounced protests, or natural disasters, or acts of terrorism),

and it is the standard for emergency management across the country. ICS includes guidelines and forms designed to facilitate activities in five major areas: command, operations, planning, logistics, and finance and administration. We reviewed ICS materials and guidelines to understand more about the objectives and criteria of compliance with ICS.

- **Survey of Other Cities:** To learn how other jurisdictions plan and determine the staffing for special events, we conducted a survey by talking with special event planning personnel in Denver, Colorado; Portland, Oregon; San Francisco, California; and San Diego, California. The results of this survey are summarized in Appendix E.

To learn about SPD's process for determining how many officers are needed at special events, we conducted the following audit work:

- **Interviews:** We interviewed the individuals within SPD who plan, coordinate, and provide oversight for police staffing of special events:
 - To learn about SPD's processes for staffing very large or high risk special events, we interviewed the Assistant Chief and Captain who led SPD's Special Operations and Planning Unit (SPOC). We also interviewed all SPOC personnel involved in planning and facilitating special events.
 - To learn how smaller precinct-based special events are planned, we interviewed personnel responsible for setting staffing levels at special events for each of SPD's five precincts.
 - We met with the Captain and Lieutenants who oversee SPD's Traffic Unit and manage events that are primarily staffed with Traffic officers, such as parades and marathons; and we met with the Lieutenant, Sergeant, and Administrative Staff Analyst who plan events that require Harbor patrol officers, such as boat races and swims.
 - We interviewed the Sergeant who plans staffing for Seattle Center events and we met with the Seattle Center event manager to understand the staffing process from her perspective.
- **Meeting Observations:** We observed five weekly meetings held at SPOC at which upcoming and past events are discussed between SPOC leadership and personnel, precinct personnel, the Traffic and Harbor units, SEO, and SPD's Fiscal Unit. These weekly meetings are the primary way in which police staffing decisions are reviewed and approved by SPD upper management.
- **File Review:** We reviewed the planning documents and any after action analysis documents for a sample of events. We selected a judgmental sample that included large events coordinated by SPOC, smaller events planned by the precincts, events planned by the Harbor and Traffic Units, events at the Seattle Center, and events for which police staffing was reimbursed through an MOU. We also reviewed additional event planning documents that were made available to us during our interviews and file reviews. We ultimately requested or reviewed event planning or after action documents for a total of 68 events from 2015 and 2016. The results of our file review cannot be projected to the population of all special events staffed by SPD, as we did not select a random sample. Rather, we designed our sample to ensure we reviewed documents for different types of events planned by different SPD entities.

Audit Results

SPD's approach to determining the staffing for an event includes many aspects of best practices guidance. However, we saw a wide range in how staffing plans are documented, how much detail plans include, and how much analysis of staffing is conducted after an event. SPD's process for staffing special events is not documented and until recently there was limited independent review of staffing plans. Since 2016, SPD has been working to improve the oversight of event staffing decisions (through SPOC's reviews of staffing plans) and the consistency of documentation. These are excellent first steps, but they were recently implemented, are still evolving, and do not yet include any regular or required systematic tracking of event hours by event or event type. Our more detailed audit findings and recommendations in this area are in the Event Planning and Staffing section of this report.

APPENDIX D

Methodology for Calculating Direct Costs – Technical Appendix

Background and Approach

A primary reason cited in support of Ordinance 124860, passed on September 29, 2015, was that the existing special event permit fee structure was arbitrary and did not reflect the City of Seattle's (City) costs of resources expended. The fee structure proposed in the ordinance was not intended, however, to reflect "full costs," but to recover portions of "direct costs" based on the event type (e.g., Commercial or Free Speech).³³

For the purposes of this performance audit, we created a direct cost model that would allow us to compare, on an event-by-event basis, the police costs directly related to the event versus the amounts paid to the City by the event sponsor. By "direct costs" we are referring to the costs or expenditure of resources that would be avoidable (not incurred) if the police staffing of the event had not occurred. This concept of avoidable cost is readily understood in the context of using staff on overtime for events, because without the event the City would not have had to pay the overtime wages and related costs.

We recognize that the City also incurs indirect and overhead costs related to staffing special events. Examples of indirect and overhead costs include the cost of SPD's Seattle Police Operations Center (SPOC), staff time spent planning or evaluating event staffing, and the allocation of Police Department and City central services costs used to support all police operations. In keeping with our understanding that the intent of the ordinance was not to recover full costs, our cost comparisons in this report involve direct costs only.

The major difference between the costs we portray and the costs per hour of police service being charged to event organizers is that, in most cases, even when the City is intending to recover direct costs (i.e., for reimbursable events), the City is charging for direct wages only, or in some cases a portion of related City-paid benefits as well.

Examples: For a large sports event in 2016, we calculated that the City incurred \$21,076 in direct overtime costs for Police Officers and Parking Enforcement Officers, but was reimbursed \$16,443 (or 78%) because the City recovered the costs of wages only. At a much smaller corporate event, where security was provided by Police Officers on overtime, the event sponsor was charged for wages and partial benefits (retirement and Medicare), but not the full array of benefits and other non-wage related direct costs. We calculated the direct cost to the City for staffing this event to be \$7,819, whereas the City was reimbursed for \$6,640 (or 85%).

For Permitted Events, costs recovered by the City, if any, can vary greatly depending on the type of event and whether fees are negotiated; and the \$67 per hour rate established by ordinance for Permitted Events was not intended to fully cover direct costs.

³³ See the [PowerPoint document](#) "Special Events Ordinance," Seattle City Council Committee on Housing Affordability, Human Services, and Economic Resiliency, August 6, 2015, Slides 3 and 4.

As we were conducting this performance audit, we learned that SPD is embarking on more fully identifying and potentially capturing applicable direct costs. Our approach fills in gaps in the direct cost calculation, as explained below, and can complement SPD's ongoing efforts.

Calculating Direct Costs

Below we discuss the major cost components included in our calculations of direct costs for Police Officers and Parking Enforcement officers who work regular time and overtime at events. At the end of this appendix we include a table that provides detail on the costs applied, based on actuals and estimates for 2016.

Overtime Wages with Variable Benefits

In addition to the time and one-half hourly wage the City pays Police Officers and Parking Enforcement Officers when they work overtime for events, the City incurs other direct costs for variable benefits based on either the dollar amount paid in wages or the number of hours worked.

- *Benefits Based on Dollar Amount Paid:* These benefits include Retirement, Social Security, Medicare, and Unemployment Insurance. The rates the City pays for Retirement and Unemployment Insurance differ between Police Officers and Parking Enforcement Officers. We included all these variable benefit costs, whereas the current fees for reimbursable events either completely exclude these costs or only include portions of them.
- *Benefits Based on Number of Hours Worked:* This benefit is Workers' Compensation, also referred to as Industrial Insurance.³⁴

We used the following formula to calculate the direct cost of an hour of overtime including variable benefits:

$$\begin{array}{l} \text{Direct Cost of an} \\ \text{Hour of} \\ \text{Overtime} \end{array} = \begin{array}{l} (1.5 \times \text{regular hourly rate}) + \\ [(1.5 \times \text{regular hourly wage}) \times (\text{sum of benefits based on wages paid})] + \\ (\text{cost per hour of Workers' Compensation}) \end{array}$$

Regular Wages with Fixed and Variable Benefits

From our review of selected special events, we found that the large majority of hours worked by police staff are on overtime. However, for the small portion of hours worked on regular time, it is important to calculate the cost in a way analogous to overtime in terms of what it is costing the City to provide an hour of service. The City has already made the policy decision that there is a cost of officers working regular time that should be attributed to, and compensated by, special events. Implicit in the City's decision is the notion that using staff on regular time for special events represents an opportunity cost – or, in other words, that some other beneficial use of the officers is foregone by using them on special events.

³⁴ Workers' Compensation is a type of no-fault insurance to cover medical expenses related to workplace injuries, and may include compensation when workers are unable to return to work. See <http://www.lni.wa.gov/ClaimsIns/Insurance/Learn/Intro/Default.asp>.

A recognized way of comparing the costs of regular time to overtime³⁵ is to consider all the direct costs associated with having an officer available for on-duty service in the field. This approach recognizes that the City of Seattle incurs costs related to leave and fixed benefits, in addition to variable benefits. Fixed benefits include such costs as medical, dental, vision and other insurance costs. There is also time off from regular work for leave and training that must be paid by the City, but is not accounted for when looking solely at the wage payment an officer receives for an hour of on-duty field work.

The formula we used for the wage and benefit costs of an hour of regular time is equivalent³⁶ to:

$$\begin{array}{l} \text{Direct Cost of an} \\ \text{Hour of Regular} \\ \text{Time} \end{array} = \frac{\text{total of annual wages and benefits} \div}{\text{regular on-duty hours in the field}}$$

Other Direct Resource Use

Placing officers in the field also involves expenditures related to vehicles, fuel, maintenance, and equipment wear and tear. We worked with SPD staff to identify annual costs for these kinds of expenses, which we could then apply on an hourly basis. We used these hourly cost estimates as placeholders in our analysis, recognizing that future refinements could consider different levels of resource use based on type, location, and duration of an event.

Additional Cost Adjustments

There are certain direct costs related to being able to have and use regular staff that do not occur annually for each officer, but can be spread among all officers on an annual basis. Officer on-boarding costs (recruitment and training) are the category of such costs that we included in the hourly cost for regular time.

For overtime, we made an adjustment that accounts for the fact that when officers elect to take compensatory time off, that time off, in addition to incurring a wage cost, reduces the annual number of on-duty, in-the-field hours worked on regular time.

Summary

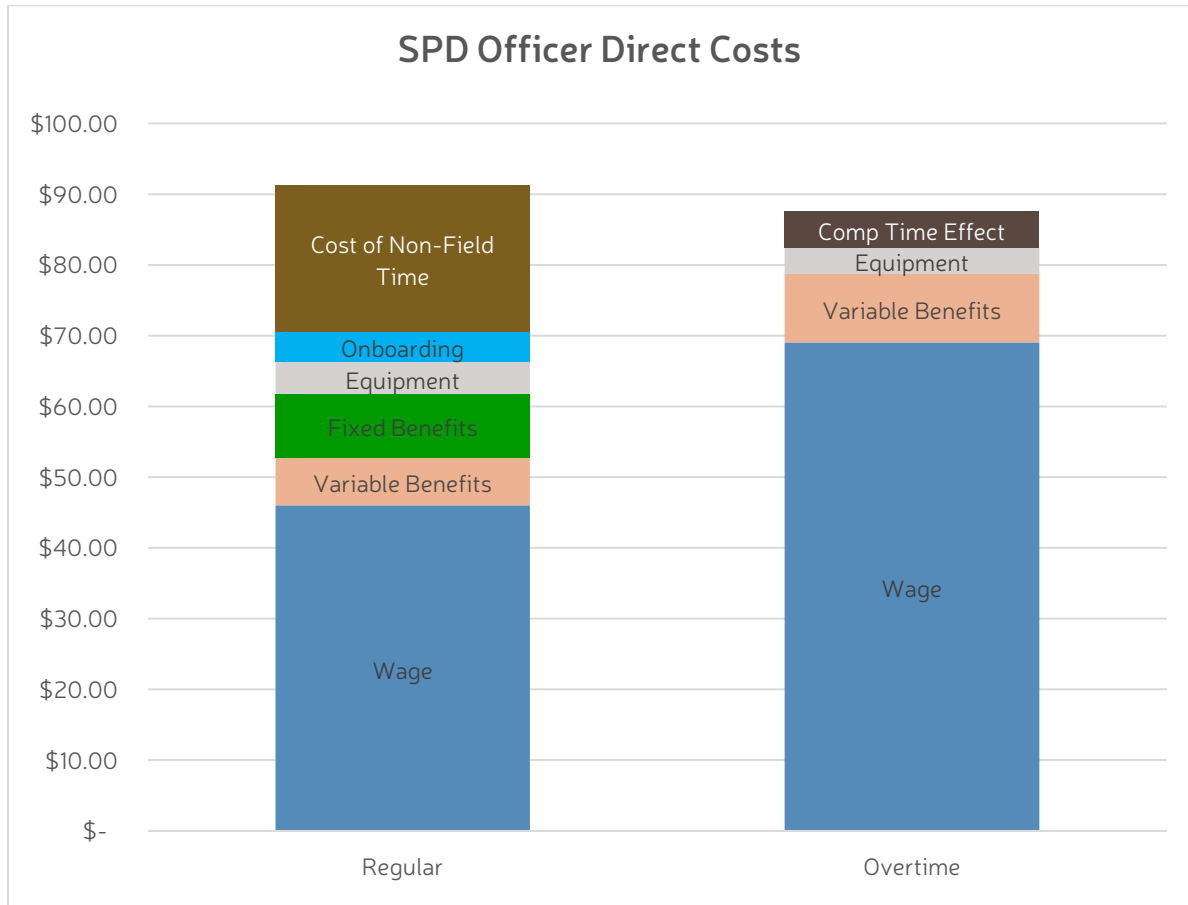
Taking the example of a Police Officer with fifteen years of service, we calculated a direct regular time rate of \$91.30 and an overtime rate of \$87.60, with regular time being approximately 4% more expensive per hour than overtime. Our similar calculation for Parking Enforcement Officers estimated regular time to be approximately 1% more expensive than overtime. Although these results may run counter to conventional wisdom, where it is taken for granted that overtime must be more expensive, they might not come as a surprise. Six years ago, a comparison of Full Time versus Overtime based on a similar methodology was

³⁵ See, for example, the Staffing Analysis training, in particular the “Comparison of Regular Staffing to Overtime” hosted by the Office of the Washington State Auditor, Local Government Performance Center, at <http://portal.sao.wa.gov/PerformanceCenter/#/address?mid=6&rid=18325>.

³⁶ Since our actual formula builds up from the hourly wage for regular time, we multiplied the subtotal of the wage and benefits by the following factor: [(total paid hours / hours in field)-1]. This is mathematically equivalent to the simple statement of the formula given above.

presented by City Council Central Staff to the Council’s Public Safety and Education Committee.³⁷ It showed regular time being 8% more expensive than overtime for SPD. The closeness of the rates comparisons comes primarily from the inclusion of fixed benefits (e.g., health insurance costs) and the focus on time-in-field in estimating direct costs for regular time.

A chart showing the components of the regular-to-overtime comparison follows:



For the cost comparisons in the report, which are based on a selection of 2016 events, we used the actual regular time and overtime wages of each officer who worked the event. The vast majority of hours (98%) from our selection of events were worked by officers on overtime.

Table of Direct Cost Components for Regular Time and Overtime

The table below shows the detail of the direct cost components. Some are based on dollars earned, while others are based on number of hours worked or the subtotal of wages and benefits. Some apply to all staff, but others vary based on whether the staff person is a Police Officer or a Parking Enforcement Officer. How the costs are applied also depends on whether the hour being used is regular time or overtime.

³⁷ Memo from City Council Central Staff to the Public Safety and Education Committee regarding Police Overtime, January 11, 2011.

Following the table of direct cost components is an example of how our full time and overtime rates are calculated for a police officer with a typical hourly wage.

Direct Cost Component Paid by the City	Per Dollar	Per Hour	Per Subtotal	Apply to Regular Time	Apply to Overtime
Social Security	6.20%			X	X
Medicare	1.45%			X	X
Unemployment Insurance	0.04%			X	X
Life Insurance		\$0.03		X	
Employee Assistance Program		\$0.01		X	
Health Benefit (Police)		\$8.96		X	
Workers' Compensation (Police)		\$0.76		X	X
Retirement (Police)	5.24%			X	X
Other Resources Fixed (Police)		\$0.79		X	
Other Resources Variable (Police)		\$3.73		X	X
Onboarding (Police)		\$4.32		X	
Effect of Comp Time taken (Police)		\$5.14			X
Cost Factor for Hours Not in Field (Police)			29.3%	X	
Health Benefit (Parking Enforcement)		\$6.84		X	
Workers' Compensation (Parking Enforcement)		\$0.14		X	X
Retirement (Parking Enforcement)	15.23%			X	X
Other Resources Fixed (Parking Enforcement)		\$0.82		X	
Other Resources Variable (Parking Enforcement)		\$6.85		X	X
Onboarding (Parking Enforcement)		\$1.04		X	
Effect of Comp Time taken (Parking Enforcement)		\$3.55			X
Cost Factor for Hours Not in Field (Parking Enforcement)			24.5%	X	

Hourly Wage Example	Per Dollar	Per Hour	Per Subtotal	Regular Time	Overtime
Wage				\$46.03	\$69.05
Police Regular Time Per Dollar	12.93%			\$5.95	
Police Regular Time Per Hour		\$18.61		\$18.61	
Police Overtime Per Dollar	12.93%				\$8.93
Police Overtime Per Hour		\$9.63			\$9.63
Subtotal				\$70.59	\$87.60
Cost Factor for Hours Not in Field			29.3%	\$20.71	
Total				\$91.30	\$87.60

Caveats

The largest part (90%) of our hourly cost estimates come directly from actual wages and the benefits paid by the City on behalf of officers. The remaining parts (other direct resources and adjustments) are based on estimates and assumptions intended to give an approximation of the costs within a reasonable range.

Our purpose was to fill in gaps in calculating direct costs, so that policymakers could have a better idea of how more fully capturing direct costs would compare to the rate and fee methodologies currently in place and being used for cost reimbursement. Therefore, our estimates are for purposes of illustration and are not intended as recommendations for specific fees. We recognize that the City could use different assumptions, and that there would be policy choices involved in setting future fees, just as there were policy choices made in setting current fees.

APPENDIX E

Survey of Other Cities

We surveyed other police agencies to learn about the types of events they provide police services for, their mechanisms for recovering the costs of staffing special events, and the processes they use to determine police staffing levels at special events.

Survey Methodology

We surveyed the following four cities:

- Denver, Colorado;
- Portland, Oregon;
- San Diego, California; and
- San Francisco, California.

We chose these cities with input from Seattle Police Department special event personnel and to follow up on information gathered by the Office of Economic Development in 2014 and 2015 for their proposal of Ordinance 124860. We did not select cities based solely on whether they were comparable to Seattle according to any particular attribute, but rather we included cities that might have practices that could be valuable for the City of Seattle to consider.

We focused our questions around three main areas: General Information, Cost Recovery, and Staffing.

General Information:

1. What kind of events does your department provide police staffing for?
2. About how many events a year receive police services?
3. Does your city or department recover the costs of police staffing for special events? If so, what is the method of recovering costs (e.g., permit fee or contractual agreement)?

Cost Recovery:

4. When your department calculates the cost of police staffing, what do you include (e.g., regular wages, fixed or variable benefits, vehicle or equipment costs)?
5. Does your city use the actual wages of the individuals staffing the particular event, or is a standard wage rate used?
6. What percentage of cost does your jurisdiction charge for?
7. If the city charges a specific fee for an event (negotiated or by ordinance, etc.), is the fee adjusted if staffing for the event turns out to be larger or smaller than anticipated?
8. What types of events get free police services?

Staffing:

9. Who in your city or police department determines the level of staffing for special events?
10. Do you follow a model, guidance, or benchmarks when determining the number of officers needed for various special events?
11. Is there any independent review or oversight of staffing plans to ensure they are not under- or over-staffed, or that staffing is cost-effective?
12. Does your department do any systematic analysis of staffing hours and costs over time (by type of event, size of event, etc.)?

We conducted the survey through telephone and email conversations with representatives from each jurisdiction, and we summarized the information we received in the Survey Results section below. The information included for the Seattle Police Department resulted from the research and data analyses we conducted during this performance audit.

Survey Results

General Information:

1. What kind of events does your department provide police staffing for?

Denver Police Department	Parades, marches, and other free speech activities; bike races, marathons, and other athletic events; festivals; dignitary escorts; and traffic control at the large sports stadiums.
Portland Police Bureau	Moving events on streets and sidewalks, such as parades, protests and other free speech activities, marathons, bike rides, and other athletic events. Most festivals and the professional sports venues hire private security. Some large festivals also receive Portland Police Bureau services, such as Hempfest and the Rose Festival, but this is arranged outside of the regular event permit process.
San Diego Police Department	Parades, marathons and other athletic events; free speech activities; festivals; dignitary escorts; and film shoots.
San Francisco Police Department	Free speech activities, street fairs and festivals, concerts, marathons and other athletic events, professional sports events, construction sites and other traffic control situations, and store openings.
Seattle Police Department	Parades; marches, protests, and other free speech activities; marathons, bike races, swims, and other athletic event; festivals; dignitary escorts; film shoots; high school dances; and traffic control (and some security) at the large sports stadiums.

2. About how many events a year receive police services?

Denver Police Department	They provide services to about 500 events per year, although they are involved with another 200-300 events annually.
Portland Police Bureau	In 2016, about 50 events required police staffing. This included about 20 athletic events, about 20 parades, and about 10 protests. One factor in event volume is that Portland is not allowing any new events, because police staffing levels are so low. The overtime need is already so high for regular police work that the City is limiting how much overtime can be used for special events. They now will only staff events that require 33 or fewer officers. Events must change their plans, route, or footprint to ensure it can be policed with no more than 33 officers, or the event is not approved.
San Diego Police Department	Events are staffed by sworn officers, Special Event Traffic Controllers (SETCs), or a combination of both. SETCs are non-sworn part-time limited hourly employees who do not get benefits and are paid about \$18-\$19 per hour. SETCs direct traffic, so sworn officers don't have to handle this role. Many events are staffed primarily with SETCs. For example, marathons are about 90% staffed by SETCs. The San Diego Police Department staffs about 225 events per year with sworn officers, and they staff another 100-150 events per year with SETCs only. When only SETCs are assigned, the organizer contracts directly with the SETC unit.
San Francisco Police Department	Police services are provided by either on-duty resources or through San Francisco's 10B Program, through which entities can hire uniformed officers to provide security or other police services. Events can be counted different ways. Between July 2015 and June 2016, they billed \$14 million in revenue, for about 1.4 million hours, for events staffed under San Francisco's 10B program.
Seattle Police Department	In 2016, police services were provided at about 724 special events.

3. Does your city or department recover the costs of police staffing for special events? If so, what is the method of recovering costs (e.g., permit fee or contractual agreement)?

Denver Police Department	Denver has three different mechanisms for providing police services to events and recovering the associated costs: <ol style="list-style-type: none"> 1. First Amendment activities and most parades do not pay for officer costs or barricades. The exception is parades that extend beyond 15 blocks, which must cover the costs of barricades and officers at time and a half. 2. Athletic events, such as marathons and bike races, are policed by off-duty police officers on their own time. Planning and payment of the officers is coordinated through the department's Office of Secondary Employment, but the officers are paid by the event organizer.
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	<p>3. Events at the large stadiums, private venues, City parks, or the convention center arrange for security on their own, though they may hire off-duty police officers (either through the Office of Secondary Employment or through private arrangements).</p>
Portland Police Bureau	<p>For moving events on City streets and sidewalks (e.g., athletic events, parades, and marches), there is a flat permit fee that is not designed to cover police staffing costs. Police costs are estimated separately before the event and billed afterwards. They recover police costs for athletic events (e.g., marathons, bike rides, and fun runs); but they do not attempt to recover costs for parades, which are seen as community events, or for protests.</p> <p>Some large festivals (e.g., Hempfest, Rose Festival) also have police working at them, and these non-moving events contract directly with the Police Bureau for these services. There is no cost recovery for the Rose Festival.</p>
San Diego Police Department	<p>There are two City Council-established rates for police services:</p> <ol style="list-style-type: none"> 1. If the organizer is a commercial or for-profit entity, the charge is \$97/hour for a sworn individual (of any rank) and \$28/hour for a Special Event Traffic Controller (SETC). 2. If the organizer is a not-for-profit entity with a validated 501C from the IRS, the charge is \$55/hour for a sworn individual (of any rank) and \$22/hour for a SETC. <p>The rate does not vary by type or nature of event (e.g., how much tickets sell for, whether there is alcohol). It varies only by the type of organizer (for-profit or not-for-profit).</p>
San Francisco Police Department	<p>Through San Francisco's 10B program, entities contract with the San Francisco Police Department for uniformed officers with all their equipment. Under 10B, the intent is to bill for full cost recovery.</p>
Seattle Police Department	<p>Seattle has two different mechanisms for charging for police services at special events:</p> <ol style="list-style-type: none"> 1. Special Events Permit: Events that are held in parks, City-owned properties, or other public places and meet certain criteria require special events permits. The types of events that need permits include parades, protests, music festivals, street fairs, and athletic events (e.g., marathons and bike races). Some types of events pay for police services, and some do not. Events that are categorized as Commercial or Athletic pay an hourly rate that is based on, but discounted from, average SPD overtime rates (in 2016, the rate was \$67 per hour). Events that are categorized as Citywide pay a negotiated charge for police services. Free Speech events and events categorized as Community or Mixed Free Speech are not charged for police staffing.

	<p>2. Memorandum of Understanding (MOU) with SPD: Some event organizers contract directly with SPD for police staffing. SPD generally charges for its services based on MOU terms that specify that actual direct hourly wages will be charged, but sometimes the MOUs set a flat dollar amount. Types of events that receive police services under an MOU with SPD include professional sports events, events at Seattle Center (some under an MOU between SPD and the Seattle Center and some with their own individual MOUs with SPD), some large corporate events, public high school dances, film shoots, and various smaller events.</p>
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Cost Recovery

4. When your department calculates the cost of police staffing, what do you include (e.g., regular wages, fixed or variable benefits, vehicle or equipment costs)?

<p>Denver Police Department</p>	<p>The Denver Police Department charges a permit fee, and they charge some events for wages. They do not currently charge for employee benefits or vehicle use.</p> <p>There is a permit fee of \$50 for parades of 15 blocks or less or \$150 for longer parades or other special events.</p> <p>In addition, for parades over 15 blocks or for other types of special events (e.g., athletic events), organizers pay set hourly pay rates for the officers who work the event. Rates range from \$45 to \$70 per hour, and are determined by the ranks of the officers at the event. There is a four-hour minimum for all events.</p>
<p>Portland Police Bureau</p>	<p>The Portland Police Bureau has calculated flat rates designed to recover direct personnel costs for an hour of work, including the costs of wages, benefits, insurance, and taxes.</p>
<p>San Diego Police Department</p>	<p>The rates set by the San Diego City Council are intended to achieve full cost recovery, including wages, benefits, fuel, use of vehicles, paid time off, and other costs to the City. They used the median cost of an officer on overtime and adjusted the rate down (from \$98 to \$97/hour for sworn, and from \$30 to \$28/hour for SETCs) as the actual median rate decreased. They did this to ensure the rates accurately reflected costs. All sworn officers working events are on overtime. The police department is not allowed to pull officers from the field to support an event. SETCs are not on overtime, as they are part-time staff. They also don't get benefits, but they do use a city vehicle when going to an event.</p>
<p>San Francisco Police Department</p>	<p>The rates charged under the 10B program are based on the overtime rates of officers, by rank, and the rates charged increase as overtime rates increase over time. There is a rate for each rank of officer, set at the highest step for that rank. Additionally, they add an administrative fee of 14.7% (to recover program office costs and other overhead), and a benefit charge of 2.2% (to recover portions of benefits such as Medicare, health care, and unemployment insurance). Although</p>

	they could bill for vehicle use, they don't. When requested, vehicles are provided if they are available.
Seattle Police Department	Neither of Seattle's methods of calculating fees for special event police services results in full cost recovery. Permit fees discount the hourly cost for police services, no events are charged for all the benefit costs associated with officers working events, and some events do not pay for all the hours worked. Moreover, neither methodology bills for any planning hours or incidental expenses (e.g., food, water, and supplies).

5. Does your city use the actual wages of the individuals staffing the particular event, or is a standard wage rate used?

Denver Police Department	<p>A standard wage rate is used, based on the ranks of the actual officers who work an event, with a four-hour minimum.</p> <table border="0"> <tr> <td><u>Special Events (e.g., festivals)</u></td> <td><u>Marathons</u></td> </tr> <tr> <td>\$45/hour for officers</td> <td>\$50/hour for officers</td> </tr> <tr> <td>\$50/hour for supervisors</td> <td>\$60/hour for supervisors</td> </tr> <tr> <td>\$55/hour for commanders</td> <td>\$70/hour for commanders</td> </tr> </table>	<u>Special Events (e.g., festivals)</u>	<u>Marathons</u>	\$45/hour for officers	\$50/hour for officers	\$50/hour for supervisors	\$60/hour for supervisors	\$55/hour for commanders	\$70/hour for commanders
<u>Special Events (e.g., festivals)</u>	<u>Marathons</u>								
\$45/hour for officers	\$50/hour for officers								
\$50/hour for supervisors	\$60/hour for supervisors								
\$55/hour for commanders	\$70/hour for commanders								
Portland Police Bureau	Standard rates are used, and they vary by rank, whether the position earns a premium pay, and whether the hours worked were on regular time or earned overtime.								
San Diego Police Department	A standard hourly rate is used, which is based on the median cost of an officer or SETC.								
San Francisco Police Department	There is a set rate for each rank of officer, set at the highest step for that rank. Then entities pay based on the rank of the officers who staff the event.								
Seattle Police Department	Seattle varies in whether event promoters are billed for officers' actual hourly rates or standard wage rates. Permitted events that are categorized as Commercial or Athletic are charged a standard hourly rate for police services (in 2016, the rate was \$67/hour). Permitted events that are categorized as Citywide pay a negotiated rate for police services, and the equivalent hourly rate for police services varies by event. Some MOUs for police services specify a standard hourly rate for police services, and others specify that actual hourly rates will be charged.								

6. What percentage of “cost” does your jurisdiction charge for?

Denver Police Department	By ordinance, the cost of special event police services, including barricades, must be paid by the event organizer. The cost recovered includes wages only; it does not include benefits, vehicles, or other expenses beyond wages. They recover based on actual overtime rates of the officers (if the event is a parade over 15 blocks), or they invoice on behalf of off-duty officers using the rates listed in #5.
Portland Police Bureau	The rates were designed to recover direct personnel costs for an hour of work, including the costs of wages, benefits, insurance, and taxes. The goal is full cost recovery. Vehicle and equipment costs are factored into the overhead costs. In addition to police costs, Portland charges for other services associated with the event, such as transportation services, traffic design, staff to put out cones and other materials, and car removal costs.
San Diego Police Department	The rates were set to achieve full cost recovery, including wages, benefits, fuel, use of vehicles, paid time off, and other costs to the City.
San Francisco Police Department	Under 10B, the intent is to bill for full cost recovery.
Seattle Police Department	The percentage of cost recovery varies on the police fee calculation method used. For permitted events, in 2016 there was about a 27% cost recovery rate of wages for Athletic, Commercial, and Citywide events that are charged for police staffing, and there is no cost recovery for police staffing for Free Speech, Mixed Free Speech, and Community events. Cost recovery for the large Seattle Center festivals (Folklife, Bite of Seattle, and Bumbershoot) ranged from 2.5% to 57% of wages in 2016. For other events that were billed under an MOU with SPD, charges generally recovered the cost of officer wages. Neither of Seattle’s methods of billing for police services at special events recover all benefit costs, planning hours, or incidental expenses (e.g., food, water, and supplies).

7. If the city charges a specific fee for an event (negotiated or by ordinance, etc.), is the fee adjusted if staffing for the event turns out to be larger or smaller than anticipated?

Denver Police Department	They charge based on actual hours (with a four-hour minimum) and actual number of officers who work an event.
Portland Police Bureau	Costs billed are based on the actual number of personnel who worked, by rank, and the number of hours worked. There is a four-hour minimum. After the Planning Sergeants do their after action reports, they send a sheet that lists the personnel, ranks, and hours for the event to the Special Events Coordinator (in the Bureau of Transportation). The Special Events Coordinator invoices for police costs along with the permit fee, transportation services, traffic

	design, staff to put up materials (e.g., cones), parking removal, and any other expenses. The city generally bills 20-30 days after the event.
San Diego Police Department	At the end of each event, the department bills for the actual staffing and hours worked.
San Francisco Police Department	The staffing level is estimated before the event, but the charges are based on actual hours worked, with a four-hour minimum. Many times, officers must work longer than originally anticipated, and so the invoice will include the additional hours upon agreement of the event planner. They can also reduce the invoiced hours, within the four-hour minimum, in case an event ends earlier than anticipated.
Seattle Police Department	This varies based on the calculation method used. Permitted Athletic and Commercial events may be refunded if actual police hours were less than what was estimated and billed, but permitted events are not billed for actual hours that exceed the initial estimates. Event promoters who contract directly with SPD for police services pay for the actual hours worked.

8. What types of events get free police services?

Denver Police Department	Free speech events receive free police services, and parades are considered free speech events if they are 15 blocks or less in length.
Portland Police Bureau	They do not recover costs for parades, because these are seen as community events; and they do not attempt to recover any costs for protests. They also do not charge for police services at Rose Festival events. This includes three parades, a waterfront festival, and other events produced. Some city events that occur on city property (e.g., an annual tree-lighting event) are not charged for police services.
San Diego Police Department	The only events that do not pay for police services are First Amendment events. They also generally don't use overtime for First Amendment events: the commander in charge must use on duty resources, and planning is outside of the Special Event process. There has been only one time when a non-profit asked for an event to be considered First Amendment, but ultimately the Police Department determined that it was not a First Amendment event.
San Francisco Police Department	Free speech events are always worked by on-duty resources, with city-paid overtime if needed. Some events can be staffed with a mix of city-paid and reimbursed hours or all city-paid, and the decisions on whether to bill for staffing are made by the District Station Event Coordinators and their commanding officers. There are no clear criteria for whether to bill. Some events are in a gray area between festival and free speech activity, and others are cultural events that occur annually and have a history in the city. Fees for these events are negotiated on a case by case basis,

	<p>and often the decision on whether to bill is based on historic precedent. Another factor is whether the promoter charges an admission fee. Event promoters can appeal decisions up to the Chief of Police.</p> <p>Overall, very few event promoters dispute paying under the 10B program.</p>
Seattle Police Department	Free Speech, Mixed Free Speech, and Community events are not charged for police services.

Staffing

9. Who in your city or police department determines the level of staffing for special events?

Denver Police Department	The Denver Police Department’s Special Events Unit is supervised by a sergeant, and this unit develops the staffing plans for most straightforward special events, parades, and professional sports events. The unit’s commander plans more complicated events, protests, and large events (e.g., events that required Canine or SWAT officers). Even if the organizer will be paying for off-duty officers, the Special Events Unit is involved in planning police staffing for the event.
Portland Police Bureau	Staffing for most special events, including moving and stationary events, are made by one of two Special Event sergeants in the Traffic Unit. For large protests, there will be an Incident Commander and Emergency Command Center personnel who will plan the event and handle contingencies. Incident Commanders are usually lieutenants and above, although they can be a sergeant.
San Diego Police Department	The Special Events Unit is supervised by a sergeant, and staff in this unit determine the staffing for events. The sergeant approves the staffing levels set by officers in the unit; and he asks questions and adjusts the staffing if the level isn’t warranted.
San Francisco Police Department	Staffing decisions are made by the District Station Event Coordinator (usually a sergeant), under direction and approval from the District Station Commanding Officers (usually a captain), for the district that will be handling the event. Based on the decisions made by the District Stations, the 10B Program Supervisor writes an estimate for the agreed upon staffing.
Seattle Police Department	Decisions about the number of officers necessary for special events are made by the personnel throughout the Department. For large or complicated events, an Incident Commander is responsible for the command and operations elements of the event, including setting the staffing levels. For smaller, precinct-based events, a sergeant or officer may make the staffing decisions. When events require officers predominantly from SPD’s Traffic or Harbor Units, a sergeant or lieutenant from the affected unit determines the number of staff needed.

10. Do you follow a model, guidance, or benchmarks when determining the number of officers needed for various special events?

Denver Police Department	They do not use formulas or a model, because every event is different. Most staffing plans are driven by the geography (e.g., route, street closures, number of blocks and intersections) and the nature of the event (e.g., attendance, whether there will be alcohol). Events must be considered individually, because some small events require more staff than those with large attendance.
Portland Police Bureau	Portland streets are predominantly laid out in a one-way grid, and so Bureau personnel can often calculate the number of officers needed to close the streets for a moving event of a particular size. They know that their blocks can hold about 150-300 people, and so they can often calculate how many officers will be needed based on anticipated attendance.
San Diego Police Department	<p>They have a general “rule” of 1 officer per 1,000 in attendance, if there is no alcohol or other risk factors. However, this is just a starting point and each event is different. They have one event that is staffed with 34 officers for about 5,000-6,000 people on a single block, and they need each of these officers. This event has a lot of alcohol and music, and its audience is a young demographic, and so you can’t just consider event attendance.</p> <p>Most events (about 85%) are recurring events that happen every year, and so they can base the plans on previous events. If there is no event history, they look at the components of the event, such as whether there is alcohol, time and day, neighborhood and target audience, type of music, and cost of admission.</p> <p>They track feedback about staffing levels in their Special Event Permitting System. All City stakeholders (Fire, Police, Waste Water, Transportation, and Engineering) have access to this system, and so they all can see the permit application and information about the event, including past after action reports. After action reports are created right in the system and include feedback on how the event went, any incidents, and whether staffing was appropriate. The Special Events Unit adds a note to every report that summarizes whether staffing was adequate so this information is easy to find when planning future events.</p>
San Francisco Police Department	Most staffing plans are based on how past similar events were staffed.
Seattle Police Department	Every event is unique and so they do not use a formula or matrix to plan event staffing, except for Traffic officers outside the major professional sports stadiums. Staffing for most events is based on an event’s history and varies by the nature of the event.

11. Is there any independent review or oversight of staffing plans to ensure they are not under- or over-staffed, or that staffing is cost-effective?

Denver Police Department	The level of review depends on the type of event. They do a lot of routine events (e.g., 5K and 10K races), and there is no oversight or command review of these plans. However, the department isn't paying for staffing many of these events. For more complicated or higher risk events, or for events that require staff from multiple units, a commander is involved in creating the plan. Staffing plans also receive minimal review from the Office of Special Events. After action reports are created only for large events or complicated events, such as a dignitary visit.
Portland Police Bureau	There is no review of staffing plans before events. The Special Event sergeants have been in their roles a long time and have the confidence of command staff. There is review of staffing costs after an event, as event costs are clearly identified and reviewed as part of the after action report process. After every event, the Special Event sergeants get input from all the officers who worked the event and puts together the after action report. These are routed to and signed by command staff.
San Diego Police Department	The Special Events Unit writes about 99 percent of event plans without review outside of the unit, and the process works well. Plans for large or complicated events that require a command van are reviewed by the lieutenant who oversees the unit. They do not write Incident Action Plans or Ops Orders, though they may write a contingency plan for events that are very large or could be problematic. A contingency plan includes information about the event, staffing, major contacts, past problems, and event protocols; and these are the events that generally required a command van. Otherwise, they create a staffing roster and communicate duties to the staff who are scheduled. They send the rosters to the sergeant or officer who is in charge of the event.
San Francisco Police Department	The event promoters review staffing estimates, and any disagreements can be appealed through the chain of command up to the Chief of Police. Additionally, there is a City Entertainment Commission that reviews event-related processes.
Seattle Police Department	Personnel who plan event staffing for precinct events or for the Traffic or Harbor Units submit their plans to their supervisors and present proposed staffing levels at the weekly SPOC meetings. Plans for larger events are created by SPOC with oversight by the Incident Commander and SPOC leadership.

12. Does your department do any systematic analysis of staffing hours and costs over time (by type of event, size of event, etc.)?

Denver Police Department	The Denver Police Department's Special Events Unit keeps track of staff hours and number of events over time. They keep spreadsheets by year to see how staffing changes, but it is getting more and more difficult to staff events fully, and so the data can be difficult to interpret.
Portland Police Bureau	Portland did this back in 2008 and 2009 when full cost recovery was initially considered. They haven't done anything more recently.
San Diego Police Department	The Special Event Unit's administrative/fiscal assistant creates a quarterly report that tracks costs by category of event (sports events, parades, non-profit, etc.). The reports also track the difference between what is charged and the total costs for the events that get the reduced rates.
San Francisco Police Department	Currently, an analyst in the City Entertainment Commission office is reviewing the City's entire event permit process.
Seattle Police Department	The Office of Economic Development researched event costs in 2015 when proposing Ordinance 124860, which revised the City's special event permit process and fee structure.

APPENDIX F

Department Response – Seattle Police Department



City of Seattle

Seattle Police Department

November 7, 2017

MEMORANDUM

To: David Jones, City Auditor
Robin Howe, Auditor-in-Charge
Cindy Drake, Auditor
Megumi Sumitani, Auditor
Robert Thomas, Consultant

From: Brian Maxey, Chief Operating Officer *MB for*
Seattle Police Department

Subject: Seattle Police Department (SPD) Response to Audit of Seattle Police Department's Special Events

Thank you for the opportunity to review the special events police staffing and cost recovery audit. SPD appreciated the chance to review previous drafts and wishes to thank the audit team for incorporating many of the department's edits and comments and for clarifying the report's language where necessary.

SPD recognizes that many of the recommendations in the audit, which was mandated by Seattle City Ordinance 12460, pertain to the Special Events Office (SEO) or City policy in general. Although the department is always interested in and willing to participate in any process that improves public policy, it can only directly impact those issues that reside within its purview. Therefore, SPD will limit its comments to items that are specifically germane to its operations related to staffing special events. This memorandum reviews and comments on the audit's findings and responds to each recommendation that pertains to SPD.

Findings

The audit made several broad findings, which are organized into three main categories: Police Fees, Cost Recovery, and Other Policy Considerations, SPD Event Planning and Staffing and Special Events Administrative Functions. The following section summarizes these findings and offers a general department response.

Police Fees, Cost Recovery, and Other Policy Considerations

The City has six different methods for calculating SPD police fees and recovers varying levels of actual SPD costs based on different definitions and categories for Special Events.

The findings accurately note that there are many methods for calculating police fees. This stems from the different ways in which an entity can obtain officers to work an event and the status of an agreement. There are permitted special events, contract events, and agreements. MOUs, or agreements that SPD enters into with specific parties, do allow for cost recovery. Over time, the costs included, the amounts per item, and the benefits that are included have changed. As the

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SPD Response to Audit of Seattle Police Department's Special Events
November 6, 2017

department enters into new arrangements these figures are updated to reflect the newest cost model. Many agreements are multiple year arrangements and fee adjustments must wait until the agreement is renewed or redone. SPD Fiscal and Budget staff spent time with the audit team looking at their recommendations to understand where they believe changes could be made. The department plans to continue evaluating these recommendations and will make changes, where applicable, to agreements as they become available for amendment.

The findings accurately note that current hourly fees for police services associated with the special events permitting process do not cover the full cost incurred by the City when a special event occurs. For police officers, actual time spent in pre-event planning, roll calls, and post event activities are not included in the current fee structure. The hourly rate is also less than the average hourly rate for officers. The process does not take into account 3-hour minimum stand-by time for overtime, employee benefits, equipment, and incidental expenses. The cost recovery for police services for special events is governed by the special events ordinance.

SPD does provide information about the costs incurred for special events consistent with the ordinance. The department agrees that fees charged for special events should be more consistent and at a higher rate than is currently required in the City's ordinance. The Special Events Committee has the ability to evaluate the hourly rate that special events organizers pay for officers. It may be good – if cost recovery is a goal – to have the committee review this rate. Additionally, the categories of events play a significant role in whether or not and to what extent the City recovers police services costs. If cost recovery is the goal, then these may need to be adjusted.

SPD Event Planning and Staffing

SPD generally follows best practices, however, it should continue to improve policies and procedures related to Special Events. Inefficiencies found in SPD's processes were due to lack of automated scheduling tools and that SPD did not regularly track hours and costs by event or event type. Some work, such as traffic-directing, could be performed by less expensive personnel.

The audit found that SPD event planning and staffing was largely within national best practices. However, there is no specific policy that requires planners to use these practices when crafting an event staffing plan. The department agrees that such a policy is necessary and is in the process of updating its policies and procedures to reflect this. This includes the consistent practice of completing an after action report. SPD has already begun to use a short form for special events after action reporting to ensure that each event – no matter the size – has post event documentation. This includes reviewing staffing plans and other components of the event.

SPD agrees that automated tools are needed for scheduling special events. A scheduling and timekeeping project is pending with the Seattle Information Technology Department (ITD). This project will improve the process of staffing special events, reduce the amount of time spent on staffing issues, improve tracking of personnel absences for special events, and provide a better mechanism for tracking all hours associated with special events. SPD is waiting for a project manager to be assigned so that the project can move forward.

SPD staffs events based on the event need and staff availability. There are types of work within events that do not require a sworn officer. Others, such as parking enforcement officers (PEO) are used in these cases. The current SMC requires police officers to be at locations where traffic control devices are present and may be countermanded. State law may also require police officers to be used in these situations.

SPD Response to Audit of Seattle Police Department's Special Events
November 6, 2017

Special Events Administrative Functions

Controls over administrative functions need improvement. Inefficiencies found in SPD's processes were due to not coding all SPD special event time to the event activity code, entry of event time into SPD's payroll system and lack of reporting of SPD event costs and fees charged.

The audit found that there is a lack of reconciling reimbursable event invoices to actual costs. The department has added an analyst in the Budget and Policy Section of the department who has the primary focus of special events staffing and overtime. This analysis will provide a better picture of pre and post staffing for special events. The majority of events are permitted well in advance of the event day. There are many variables that come into play as the event day approaches that could change the staffing. Often, attendance numbers change and this allows for adjustments. The future work schedule and timesheet project may allow the department to capture regular hours worked on a specific special event. This may contribute to the accuracy of staffing numbers for events.

SPD will explore reporting methods and frequency of reporting planned reimbursable event police hours and expenses to actual hours to help ensure all hours are properly captured. This information could be added to after action reports and would make event level reporting of expenses and revenues to special event decision makers a possibility. While SPD understands the importance of capturing and reporting this information, it ultimately is a City policy decision on how to utilize the reported information.

SPD is in favor of the City using a holistic scheduling and workflow tool like a Customer Relations Management (CRM) system to facilitate the special events process. This should be a City effort to better administer the high volume of events that take place throughout the year.

Recommendations

There were 19 specific recommendations in the audit. Of these, 14 recommendations specifically pertain to SPD. This memorandum summarizes each of these recommendations and provides a department response to it. The recommendation numbers follow those of the audit and may not be in sequential order here.

Recommendation 1

SPD should review its special events memorandum of understanding (MOU) and event billing processes to ensure cost estimates provided prior to the event are accurate and that invoices include all reimbursable costs that are sent to event organizers afterwards. SPD should also consider charging other event-related SPD costs to all reimbursable events.

SPD is interested in total cost recovery when it can seek these costs. Finance Manager Martin Yamamoto and Chief Financial Officer Mark Baird met with the audit team to discuss their model for cost recovery and shared the team's spreadsheet of assumptions. The department is currently reviewing the model and plans to amend its costs where appropriate. As MOUs come up for renewal the department will insert a new cost structure that reflects the new costs.

Recommendation 3

SPD should ensure all special event-related hours are tracked to the special events.

In addition to the time officers spend serving at events there is planning and preparation time. The special events ordinance does not permit this additional time to be part of the cost recovery calculation when an organizer applies for a permit or when actual hours are reconciled after the

SPD Response to Audit of Seattle Police Department's Special Events
November 6, 2017

event. There are meetings, planning sessions, briefings, and debriefs that frequently occur as part of the process of SPD providing service for events. Multiple events get discussed at the same time. It is difficult to parse how much time which personnel used on each event. For the total time spent on events themselves the after action reports do capture the number of staff and hours used for the event. SPD understands why there is interest in capturing all administrative time spent for an event. This would begin to create a clearer picture of just how much an event costs the City. However, the department must also balance the cost of tracking this type of time against the benefits of doing so. A City-wide CRM solution and a work scheduling and timekeeping solution could enhance the department's ability to do this in a more cost effective way.

Recommendation 4

SPD should provide actual hours worked at permitted events to the Special Events Office (SEO).

SPD has provided SEO with this type of data upon request. The department would support providing this data once it has the technological means to do so. For now, providing this information when requested seems sufficient in light of the staff time and resources that the current, manual process requires.

Recommendation 6

SPD and SEO should develop a process to address events that require police services but do not obtain either a permit or a MOU with SPD. Process should include that SPD or SEO work with event organizers to get either a permit or MOU before police services are provided and SPD or SEO to follow up with event organizers after events occurred to inform about City requirements and retroactively bill for police staffing as needed.

SPD has the responsibility to ensure public safety. The department must respond to events that occur in the City – regardless of the permit status. SPD is committed to working with other entities in the City to promote the use of the permitting process. However, protecting people and property remain the department's paramount concern. SPD also regularly meets with formal and informal leaders of unpermitted marches and demonstrations to help manage public safety.

Recommendation 7

There has been an increase in workload associated with the administrative functions SPD performs related to special events and SPD should review this workload in terms of staffing.

Over the past several years the department has experienced an increase in special events. These events do impact SPD's personnel resources. This increase also impacts the administrative functions required by SPD to perform. Recently, the department placed an Assistant Chief over SPOC to provide direct Command Staff level guidance and assessment of these functions. As part of this, SPD is reviewing how the special events planning process is staffed. The department agrees that there may need to be an increase in administrative support if the number of special events continues at or increases beyond the current level.

Recommendation 8

SPD should ensure that there are independent reviews of event staffing and event plans. Plans should be reviewed and/or updated immediately preceding an event. SPD should ensure all Special Event After Action Forms are completed.

SPD is continuing to work on its independent review process of event staffing and event plans. The new Assistant Chief or designee over the Seattle Police Operations Center (SPOC) is positioned to

SPD Response to Audit of Seattle Police Department's Special Events
November 6, 2017

review and approve of event staffing plans and event plans. The department also facilitates weekly meetings attended by all the relevant department entities that staff events. This group discusses all special events and department staffing. Additionally, the recently hired analyst will review and analyze pre and post staffing levels for events.

Recommendation 9

SPD should update its policies and procedures that address Special Event Planning and After Action Reports, to include: staffing decisions, documentation, independent review and approval, goals of the weekly SPOC meetings, and oversight responsibility. Once updated, SPD should ensure compliance with these policies and procedures.

SPD agrees that there needs to be an amendment to its policies to reflect the consistent use of the best practices that are taking place. There is a new policy in early draft form. Once it goes into effect, the SPOC Assistant Chief will ensure compliance.

Recommendation 10

SPD should begin regular tracking of event staffing information.

The previously discussed analyst will work with special events and overtime data to review and analyze it. This includes incorporating pre and post event staffing along with payroll data. Personnel are currently in the process of putting the data formats together to conduct this ongoing analysis. For payroll data, the consistent tracking of regular hours used for special events will require the previously discussed technology solution.

Recommendation 11

SPD should pursue a technology solution to improve event staffing and re-evaluate what staff, civilian or sworn, to work on event planning tasks.

The Department agrees with this and there is a Workforce, Scheduling, and Timekeeping technology project with ITD waiting to begin.

Recommendation 12

SPD should improve tracking of personnel absences and should review the department's personnel policies related to special events.

The department agrees that personnel absences for special events is problematic like an absence is for any detail or workday. Supervisors and managers review and respond to incidents consistent with department and City human resources policies.

Recommendation 14

SPD should periodically compare planned reimbursable event police hours and expenses to actual hours and expenses that are billed.

The previously discussed analyst will look at pre and post event staffing plans and personnel usage.

Recommendation 15

OED and SPD should consider investing in a Customer Relationship Management System (CRM).

SPD Response to Audit of Seattle Police Department's Special Events
November 6, 2017

SPD agrees that a multi-departmental application would benefit the special events process and would participate on developing and implementing this technology solution if the City is interested in pursuing it.

Recommendation 18

SPD should update and enforce its special event payroll policies and procedures.

The Department is interested in updating its payroll policies. All overtime hours for an event are tracked by special event number. When an employee is working on regular time their timesheet reflects the normal workday. The department currently does not code its regular time on timesheets to the special event. The documentation for an event records the personnel that are involved in an event and the hours spent on the event. However, until the department has a technology solution, the department does not plan to begin tracking regular time for special events on timesheets.

Recommendation 19

SPD should produce event-level reporting and distribute to key special events decision makers.

The department does have event-level reporting that goes to decision makers each month. The previously discussed analyst will make additional information available to a broader audience and look at increasing the breadth of the information that is included in the reporting.

Again, the Department appreciates the efforts undertaken by the City Auditor's Office to conduct this audit on Special Events – Police Staffing and Cost Recovery. Many of the issues identified in the audit are directly related to City special events policy. The department is always eager to participate in discussions about how the City permits special events and recoups its costs for police services. Likewise, where there are findings and recommendations that are not solely SPD issues the department is certainly interested in participating in solutions where appropriate. SPD does recognize that officer labor costs are the vast majority of the special permit costs and are the driver of the special events conversation. Thank you again for the opportunity to review the draft audit report and for your willingness to accept the majority of our edits and comments from previous drafts. If you have any questions or would like any additional information on any of the department's efforts that are discussed in this memorandum, please call me at (206) 684-0764.

cc:

Chief Kathleen O'Toole, SPD
Deputy Chief Carmen Best, SPD
Mark Baird, SPD Chief Financial Officer
Assistant Chief Lesley Cordner, SPD
Assistant Chief Steve Wilske, SPD
Assistant Chief Perry Tarrant, SPD
Assistant Chief Chris Fowler, SPD

Mike Fields, SPD HR Director
Deputy Mayor Kate Joncas, Mayor's Office
Beth Gappert, Mayor's Office
Ben Noble, CBO
Jennifer Devore, CBO
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APPENDIX G

Department Response – Office of Economic Development (Special Events Office) – and Office of City Auditor Response to Department Response



Seattle
Special Events Office

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October 30, 2017

MEMORANDUM

To: David Jones, City Auditor
Robin Howe, Auditor in Charge
City Drake, Deputy City Auditor
Megumi Sumitani, Assistant City Auditor

From: Chris Swenson, Citywide Event Manager
Special Events Office / Office of Film + Music

Subject: Special Events Office Response to Audit of Special Events Police Staffing and Cost Recovery

Thank you for providing an opportunity to review and respond to the Special Events Police Staffing and Cost Recovery Audit report. We greatly appreciate the work performed by the City Auditor's Office. This audit took place at the direction of Ordinance 124860 relating to the Special Events Committee, special events permitting, and special events fees, passed in 2015 unanimously by the Seattle City Council, who recognized the need for review and comparison of the City's previous and incoming policies. The audit requirement specifically directs the City Auditor to "audit the Seattle Police Department's process for staffing special events [including] the planning, authorization, staffing levels, attendance, and payment of officers for permitted special events under Chapter 15.52 ... and cover events staffing 2010 through 2015."

As detailed in this memo, the 2015 special event permitting policy reform core goals as defined by Ordinance 124860 were to: (1) better manage taxpayer dollars the City allocates to support permitted events by updating an arbitrary fee schedule to a "fee for service" model that includes some cost recovery for police staffing, (2) ensure special event permitting fees remain affordable to all events, necessitating deeper City financial investment in cultural and neighborhood events, (3) improve the City's ability to manage event organizers, event participants, and impacted citizens throughout the special event permit process, (4) strengthen SPD's planning for, interaction with, and support of permitted special events. It was understood implementing the Ordinance and fee structure would be a complete overhaul of the process, and that all of these efforts would take time and require significant procedural, and in some cases institutional, changes. The Special Events Office and all Special Event Committee members are committed to achieving best practices at all levels. As this memo indicates, we have not been passive, and are continuing to make improvements. We see this as an evolving process based on thoughtful and sound policy through Ordinance 124860.

The audit report outlines three key recommendations, detailed with 19 specific itemized recommendations, related to City cost recovery policy, police staffing, and administrative functions related to special events. With the Auditor's decision to expand the scope of the report to a definition of "special events" broader than as defined by Ordinance 124860, this memo responds primarily to the report's comments as they relate to events permitted through the Special Events Office as "permitted special events" only. Additionally, while the Special Events Office provided permit fee and other data to the Auditor for the report, we are not able to perform an analysis of or respond to much of the report's data, which limits the level of detail in our response. Our responses to the general scope of the report, followed by responses to the three key recommendations and

Page 1 of 6

additional specific responses to each itemized recommendation, touch on findings relevant to the Special Events Office and highlight the ongoing improvements taking place and efforts that are underway following the implementation of Ordinance 124860.

General Report Response

This audit was directed as part of Ordinance 124860, which was written using the framework of civic livability/enjoyment of life, economic development, cultural and community benefit, and race and social justice as core, fundamental values in the City's support of and polices related to public permitted special events. We believe the audit's overarching focus on police cost recovery is problematic because of the scope of analysis: By not taking into consideration the City's race and social justice priorities, the economic benefit of fee structures that allow large and small events to take place and thrive equally, or the cultural and community benefits, we believe the report at times oversteps its requested mission by recommending policy review toward full police cost recovery for permitted special events.

Ordinance 124860 requests an initial audit of police process of permitted special events for the 2010-2015 timeframe, so the City would be able to review past practices compared with current. The audit request continues by authorizing the City Budget Office to "utilize the audit's results and recommendations to perform subsequent annual reviews to take place in the first quarter of each year and cover special events staffing for the previous year." The intent of the initial audit and subsequent audits was to allow the Special Events Office, Special Events Committee, and SPD opportunity to make deep policy and procedural changes over time. With the report's findings based on an evolving process, we believe its policy recommendations may not be wholly appropriate as they do not relate to or fully take into account the work in progress.

During the 9+ months of the auditor's data collection and interviews, the Special Events Office engaged closely with the City Auditor's Office in providing information and informing on office, Committee, and stakeholder processes. To our knowledge, none of the hundreds of Special Event Committee and Subcommittee meeting minutes were reviewed by the Auditor. Also, key SPD and Special Events Office departmental and intergovernmental partners (e.g., SDOT, SFD, King County Metro), each of which are instrumental in determining event footprint, safety, attendance, and activity, were not interviewed by the Auditor.

Representatives of each of the agencies on the Special Events Committee review as a group, and individually, all aspects of permitted public event activity. The City's resource support, traffic control plans, transit rerouting plans, SFD staffing, SPD staffing, and overall activity permissions are based on this group and individual agency deep and broad review of all event elements. In particular, the number of attendees, and attendee type, are critical to in respect to the Committee's input provided for SPD's staffing determinations. While SPD has sole authority to assign staffing for each permitted special event, the report does not articulate input from all Committee members in respect to attendance and type of attendees as a baseline when determining the level of staffing, including SPD staffing, assigned to events. Because the report does not include other Committee representative input during this process, we believe the report's policy recommendations are made without full information.

The "success" of Ordinance 124860 in retaining, and in fact growing, the number of permitted special events in Seattle, while increasing fees collected for permitted special events, is not fully taken into account within the report. Additionally, the report lays out a current three-year trend of SPD overtime and costs becoming lower while the number of events is rising, but the report never explores the reasoning for this, or takes this into account in respect to its policy recommendations.

In not including these fundamental functions of SPD and Special Events Office management of permitted special events, we believe the report's policy recommendations are made without full information.

Police Fees and Cost Recovery

Thoughtful policy surrounding police cost recovery is at the core of the special event permit fee structure implemented with Ordinance 124860. During the formation of the Ordinance the Special Events Office and Office of Economic Development hosted two group meetings with over 80 event organizers, and held over 50 one-on-one meetings with a diverse mix of event organizers, neighborhood chambers and associations, stadiums, and regional government agencies. All nine City Councilmembers were engaged during this process. SPD and other City agencies on the Special Events Committee shared 2010-2015 staffing and financial information largely the same as what is included in this report. While greater cost recovery for permitted special events was the primary intent of the reform, feedback from event organizers, citizens, and elected officials made it clear that full cost recovery for these permitted events would adversely impact the ability for event organizers to host events in Seattle, and that it would not align with the City's values in supporting cultural and economic benefit from permitted special events.

The fee structure created allows a sliding scale for public right-of-way use, plus fees to account for additional commercial activity, plus fees for officers assigned directly to support commercial, run/walk, or ticketed events. Since the fee structure was implemented in 2016, we have seen some historic events across event categories discontinue, and we have seen new events across all categories begin and thrive.

The report notes that historic, large-scale events categorized as "Citywide" events do not provide a schedule or criteria for cost recovery. This is true, intentionally. The Citywide categorization was created for large, historic events identified as having intrinsic value to the City of Seattle, its residents, and event attendees and participants, which without individual negotiation would be billed at a rate unaffordable by the organizers, or billed at a rate too low for sensible use of taxpayer dollars. Each of the six Citywide events defined in Ordinance 124860 (Fremont Solstice Parade, My Macy's Holiday Parade, Seafair Hydroplane Races and Blue Angel Weekend, Seafair Summer Fourth, Seafair Torchlight Parade, and sports team celebratory parades) are operated by widely differing types of organizers. The Ordinance mandates individual negotiation with each of the events, and fees are established after review by the Special Events Chair and SPD, followed by a vote of the Seattle Special Events Committee based on the cultural, economic, and broad regional benefit for the events to continue in Seattle. This is modeled broadly after ordinances related to several large-scale events that occur at Seattle Center, which also are negotiated individually.

We do not disagree with the report's recommendation that consistency in police cost recovery is best policy, which is why Ordinance 124860's fee structure was created with individual and consistent rates. While we welcome, and encourage, policy review to improve processes and best governance of taxpayer dollars, we do emphasize that this should continue to be lensed through the City's values in equitably supporting public events and the positive economic and cultural benefits they bring.

Recommendation 1:

No comment as it relates to SPD MOU's.

Recommendation 2:

This review was performed in 2015 and 2016 during the formation of Ordinance 124860, and implemented unanimously into SMC by City Council. The methodology of the hourly rate and hours billed to event organizers was created through the stakeholder, elected official, and interdepartmental process described in this memo. Per Ordinance 124860, the Special Events Committee has the ability to change the rates for any element of the permit fees, and would be open to recommendations as they relate to SPD permit billing rates. Review of City policy is always beneficial, and we welcome City Council's input regarding the permitted special events policy.

Recommendation 3:

No comment as it relates to SPD accounting.

Recommendation 4:

This is currently performed on a case by case basis, and the Special Events Office agrees this should be part of the overall planning and after-action information sharing between both departments to ensure the most accurate billing and accountability.

Recommendation 5:

The categorization of types of permitted special events was created in 2015 and 2016 during the formation of Ordinance 124860 through deliberation with over 130 event organizers and stakeholders, and implemented unanimously into SMC by City Council. The methodology of the hourly rate and hours billed to event organizers, and the individual negotiation process for Citywide events, was created through the stakeholder, elected official, and interdepartmental process described in this memo. Review of City policy is always beneficial, and we welcome City Council's input regarding the permitted special events policy.

Recommendation 6:

The recommended process exists for permitted special events. No comment to non-permitted special events as it relates to general City and SPD response and/or support for unpermitted activity.

Recommendation 7:

Special Events Office agrees that appropriate staffing levels should be in place to fully and safely perform processes and meet policy requirements. Currently the Special Events Office is understaffed, and will be working with the City's budget process to ensure adequate staffing is achieved.

SPD Event Planning and Staffing

Process improvement and best practices are at the core of updates implemented by Ordinance 124860. SPD and Special Events Office communication surrounding staffing, planning, and coordination were highlighted as part of the expected outcomes of the reform. The Special Events Office supports the audit's recommendations that would improve planning processes related to the Special Event Committee's review and approval of permitted special events.

Because the audit findings were performed in 2016 and early 2017, and because the report focuses on implementations still in process instead of the requested 2010-2015 timeframe, we do not feel the report accurately shows the breadth of the improvements that have been made in a short amount of time. While not completely articulated in the report, the Special Events Office has seen deep commitment by SPD to implement these improvements since the ordinance was enacted in January 2016.

Recommendation 8:

In order to continue and improve alignment with SPD processes, Special Events Office would incorporate after action reports, tracking methods, and technology solutions (in particular a cross-departmental CRM platform) and any other updated planning or debrief process into the overall review for permitted special events.

Recommendation 9:

See Recommendation 8.

Recommendation 10:

No comment as it does not relate to Special Events Office processes.

Recommendation 11:

See Recommendation 8.

Recommendation 12:

No comment as it relates to SPD accounting.

Recommendation 13:

Special Events Office supports review of current SMC in respect to the ability of non-sworn personnel, in particular event staff, to perform some traffic or right-of-way duties.

Recommendation 14:

See Recommendation 8. Additionally, Special Events Office agrees this would improve the billing process for permitted special events.

Special Event Administrative Functions

As evidenced by the Special Events Office moving to OED in 2012 based on OFM best practices, and as evidenced by the intent and content of Ordinance 124860 and its policy reform, the Special Events Office continually strives for best practices in all its special event permit administrative functions and oversight of the Seattle Special Events Committee. The Special Events Office meets PCI (Payment Card Industry) data security standards as required by the City of Seattle, and strives to exceed supervisorial hierarchy in all financial transactions. While our work prioritizes identifying best practices for staffing and tools to support communication, billing, and data management, as evidenced in building Ordinance 124860 reform, we agree with the report's findings that the work increase has been "exponential" while staffing increases have been small (one full time staff), and budget for appropriate CRM or other platforms have not been granted. We see this as an evolving process, particularly in alignment with SPD staffing hours accounting prior to and after permitted special events take place.

Recommendation 15:

Implementation of a cross-departmental CRM (or similar) platform has been identified as a critical tool by the Special Events Office since as early as 2012. In order to support increased fees for permitted special events, Ordinance 12480 mandates appropriate process improvements, which we agree would be most immediately met by a CRM.

Recommendation 16:

Special Event Office billing and payment handling procedures are currently being folded into the City's Summit billing/payment portal as part of the platform's 2018 reimplementation process. This will align permit billing and payments with other City departments' processes. The conversion is slated to be complete in Q2 2018.

Recommendation 17:

Late fees are charged for permitted special event applications received late, but are not charged for payments received after 30 days before permitted special events take place. Special Events Office is open to recommendations on policy changes that would incorporate both, as long as there is no "double jeopardy" by charging two late fees.

Recommendation 18:

No comment as it relates to SPD accounting.

Recommendation 19:

Special Events Office supports and encourages informed policy updates such as this recommendation, and look forward to working with SPD, Seattle Center, and City Budget Office to employ best practices for this review.

In closure, the Special Events Office is eager to strengthen the permitted special events process based on the appropriate recommendations within this report. In their work on the Special Events Committee and as the primary cost in the City's support of permitted special events, we see SPD as a key partner in this process

improvement, and will work in alignment as we, and they, update processes and implement changes.

Again, the Special Events Office, which is managed by the Office of Film + Music, is grateful to the City Auditor's Office for the examination of the planning, authorization, staffing levels, and payments of officers for permitted special events under SMC Chapter 15.52. The report will further the Special Events Office's commitment to achieving best business practices. Thank you for the opportunity to review the draft audit report and provide comments. If you have any questions or would like any additional information on the department's efforts that are discussed in this memorandum, please call me at (206) 733-9245.

cc:

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Kate Becker, OFM
Deputy Mayor Kate Joncas, Mayor's Office
Fred Podesta, Mayor's Office
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Chief Kathleen O'Toole, SPD
A/Chief Chris Fowler, SPD
Mark Baird, SPD CFO
Robert Nellams, Seattle Center
Marc Avery Jones, Seattle Center

Office of City Auditor's Response to the Special Events Office Letter

The following are the Office of City Auditor's comments in response to some of the Special Events Office's statements in their letter dated October 30, 2017.

Special Events Office Statement

"By not taking into consideration the City's race and social justice priorities, the economic benefit of fee structures that allow large and small events to take place and thrive equally, or the cultural and community benefits, we believe the report at times oversteps its requested mission by recommending policy review toward full police cost recovery for permitted special events."

Office of City Auditor Comment

Our office considers Race and Social Justice Initiative impacts for every audit, including this one.

The audit does not recommend full cost recovery for police services at permitted special events. In the audit's three recommendations related to cost recovery for permitted special events (Recommendations 2, 4, and 5), we recommend that City policy makers review the implementation of Ordinance 124860 and ensure that the results are aligned with their intentions. We also do not recommend charging Community or Mixed-Free Speech events for police services. We recommend (Recommendation 5) that City policy makers consider whether the level of commercial activity at some events should affect event category decisions.

Special Events Office Statement

"The intent of the initial audit and subsequent audits was to allow the Special Events Office, Special Events Committee, and SPD opportunity to make deep policy and procedural changes over time. With the report's findings based on an evolving process, we believe its policy recommendations may not be wholly appropriate as they do not relate to or fully take into account the work in progress."

Office of City Auditor Comment

This audit recognizes that special events policies and functions are part of an evolving process. Ordinance 124860 mandated this audit, and ongoing annual reviews by the City Budget Office to monitor and assess that evolving process and the impacts of the new police fees. We commend the work that has been undertaken by the Special Events Office, the Special Events Committee, and SPD to implement the new policies and procedures.

Special Events Office Statement

“To our knowledge, none of the hundreds of Special Event Committee and Subcommittee meeting minutes were reviewed by the Auditor. Also, key SPD and Special Events Office departmental and intergovernmental partners (e.g., SDOT, SFD, King County Metro), each of which are instrumental in determining event footprint, safety, attendance, and activity, were not interviewed by the Auditor.”

“Representatives of each of the agencies on the Special Events Committee review as a group, and individually, all aspects of permitted public event activity. The City’s resource support, traffic control plans, transit rerouting plans, SFD staffing, SPD staffing, and overall activity permissions are based on this group and individual agency deep and broad review of all event elements. In particular, the number of attendees, and attendee type, are critical to in respect to the Committee’s input provided for SPD’s staffing determinations. While SPD has sole authority to assign staffing for each permitted special event, the report does not articulate input from all Committee members in respect to attendance and type of attendees as a baseline when determining the level of staffing, including SPD staffing, assigned to events. Because the report does not include other Committee representative input during this process, we believe the report’s policy recommendations are made without full information.”

Office of City Auditor Comment

We attended two Special Event Committee meetings to observe what transpires at these meetings. We found that proposed new events were presented to the group and recurring events were discussed, especially any planned changes from the prior year’s event. We also reviewed a small number of Special Event Committee and subcommittee meeting minutes. In the ‘Event Planning and Staffing’ section of our report, we describe the Special Event Committee’s process of capturing after-event information about permitted events in its meeting minutes, and Recommendation 9 states that SPD should update its policies and procedures to ensure that assessments of event staffing levels include feedback from external parties (e.g., event organizers and Special Event Committee members) when feasible.

Our focus was on SPD’s processes for determining how many police personnel to assign to special events, and our report documents the process that was described to us by SPD officials and supported by our review of SPD event planning documents. Our report recognizes the input of the Special Events Office at the SPD’s weekly staffing meetings and SPD’s consideration of event details, which the Special Events Committee may help determine. We also explain that the planning process for some events includes meetings with event promoters and coordination with other City departments. Our descriptions of SPD’s processes for creating event staffing plans (as described in the ‘Event Planning and Staffing’ section and Appendix D of the report) are based on our interviews of 31 officials from 14 different SPD units or sections, our observations of SPD’s weekly event staffing meetings, and our review of SPD staffing documents related to 68 events from 2015 and 2016.

Special Events Office Statement

“The “success” of Ordinance 124860 in retaining, and in fact growing, the number of permitted special events in Seattle, while increasing fees collected for permitted special events, is not fully taken into account within the report.”

“Additionally, the report lays out a current three-year trend of SPD overtime and costs becoming lower while the number of events is rising, but the report never explores the reasoning for this, or takes this into account in respect to its policy recommendations.”

“In not including these fundamental functions of SPD and Special Events Office management of permitted special events, we believe the report’s policy recommendations are made without full information.”

Office of City Auditor Comment

We did not review total special event permit fees revenues. We did review revenues from the new police fee that is charged to some permitted events and we reviewed the costs associated with police services for permitted events. The ordinance revisions went into effect in 2016 and our report indicates that the number of permitted events with police staffing that could be charged for police services (i.e., Athletic, Commercial, Citywide) increased by 8% from 2015 and SPD’s wages for hours worked for these events increased by 5.3%. Total police fees charged for permitted events in 2016 were \$629,505, which we could not compare to 2015 or prior years’ because the separate police fee did not exist prior to 2016.

We do not make policy recommendations in this audit, but we recommend that City policy makers look at the implementation of Ordinance 124860 and ensure that the results are aligned with their intentions. We follow Generally Accepted Government Audit Standards (GAGAS) for all our audit work. Our findings for this audit are supported by sufficient and appropriate evidence, as required by the GAGAS standard for audit evidence.

APPENDIX H

Seattle Office of City Auditor Mission, Background, and Quality Assurance

Our Mission:

To help the City of Seattle achieve honest, efficient management and full accountability throughout City government. We serve the public interest by providing the City Council, Mayor and City department heads with accurate information, unbiased analysis, and objective recommendations on how best to use public resources in support of the well-being of Seattle residents.

Background:

Seattle voters established our office by a 1991 amendment to the City Charter. The office is an independent department within the legislative branch of City government. The City Auditor reports to the City Council, and has a four-year term to ensure her/his independence in deciding what work the office should perform and reporting the results of this work. The Office of City Auditor conducts performance audits and non-audit projects covering City of Seattle programs, departments, grantees, and contracts. The City Auditor's goal is to ensure that the City of Seattle is run as effectively, efficiently, and equitably as possible in compliance with applicable laws and regulations.

How We Ensure Quality:

The office's work is performed in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. These standards provide guidelines for audit planning, fieldwork, quality control systems, staff training, and reporting of results. In addition, the standards require that external auditors periodically review our office's policies, procedures, and activities to ensure that we adhere to these professional standards.

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