



Seattle Office of Inspector General

2023 OIG Work Plan

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I. Introduction

The Office of Inspector General for Public Safety (OIG) was established in 2017 as part of Seattle’s police oversight system. OIG provides oversight of management, practices, and policies of the Seattle Police Department (SPD) and Office of Police Accountability (OPA). OIG promotes fairness and integrity in the delivery of law enforcement services and the investigation of police misconduct. OIG strives to make systemic recommendations for lasting reform that reflect the values of Seattle’s diverse communities.

OIG responsibilities include:

- conducting performance audits and reviews to ensure the integrity of SPD and OPA processes and operations;
- ensuring SPD is meeting its mission to address crime and improve quality of life through the delivery of constitutional, professional, and effective police services that retain the trust, respect, and support of the community;
- reviewing OPA’s intake and investigation of misconduct allegations;
- evaluating SPD response to incidents involving death, serious injury, serious use of force, mass demonstrations, or other issues of significant public concern to assess the integrity of SPD investigative processes; and
- making recommendations to policymakers for increasing fairness and integrity in the delivery of SPD services and related criminal justice system processes.

To fulfill these responsibilities, OIG has four operational functions: audit, policy, investigations, and strategic leadership, guided by an overarching goal to work toward a sustainable, accountable law enforcement system.

Looking Back and Ahead

In addition to producing important work and continuing to strengthen relationships with community, OIG was able to use 2022 as a building year for internal processes and staffing. The audit, policy, and OPA/investigations teams all focused on achieving full staffing, training staff, developing and implementing processes to ensure quality control, and teambuilding. These efforts produced a solid foundation for undertaking new bodies of work in the area of surveillance review and transitioning of federal monitor duties to OIG.

The coming year will provide an opportunity for OIG to step into the role of ensuring continued progress begun with the consent decree, while continuing to provide SPD and OPA with ongoing critical insight and critique, informed by audits, best-practices, and community input.

Project Prioritization



OIG uses a risk management approach for project selection. This increases the effectiveness of OIG resources and focuses efforts on issues with greater impact on the City and its residents. Risk assessment has two components: potential impact and likelihood of the impact occurring. OIG prioritizes issues with risks that have a high potential impact and a high likelihood of occurrence.

In the OIG assessment process, high-impact risks include, but are not limited to, those involving potential loss of life, racial disparity, damage to public trust, or weakening of accountability systems or major reforms. Likelihood is evaluated through a variety of factors, including past incidents and the strength of any preventative or mitigating systems.

OIG considers information from a wide variety of sources, such as:

- systemic issues identified by OIG staff during ongoing work;
- input from community members;
- referrals or work plan requests from stakeholders;
- regulatory and consent decree-related requirements;
- best practice trends, reports, or activities in the field of accountability, both within the City and in other jurisdictions; and
- current events and news media.

With so many sources of significant topics and limited OIG resources, OIG strategically balances project selection to better achieve our work plan commitments. Any projects added during the year will undergo holistic consideration of need versus impact on ability to complete existing projects.

This work plan preserves necessary space for emerging issues that may arise during the coming year. That space is critical for work efficiency, allowing OIG to complete a planned body of work, while providing flexibility to address unanticipated issues of concern.



II. Audits

This section of the work plan describes work performed by OIG's Audit Unit. The Audit Unit follows the Generally Accepted Government Auditing Standards (GAGAS) set by the United States Government Accountability Office. These standards provide requirements for how OIG auditors perform their work, including guidelines related to independence, objectivity, standards of evidence, and reporting.

OIG sometimes issues non-audit reviews, including alert letters, when full compliance with GAGAS is not feasible. The decision to issue a non-audit review may be made due to external time constraints, the urgency of an issue, or if the work was performed by an external consultant. In all cases, OIG follows the same evidence and quality control standards applied to its audit products.

Ongoing Projects

Youth Miranda Rights

In July 2022, OIG initiated an audit of SPD's compliance with the Mi'Chance Dunlap-Gittens Youth Rights Ordinance. This project is anticipated to be completed in 2023.

Leave Administration

In July 2022, OIG initiated an audit to assess SPD's controls to prevent fraud, waste, and abuse of leave benefits. This project is anticipated to be completed in 2023.

Mutual Aid

OIG is conducting an audit of SPD operations and actions when engaging with other law enforcement agencies pursuant to task force and mutual aid agreements to assess compliance with SPD policy. Due to staffing limitations and other priority audits, this project was suspended through 2022 and will be completed in 2023.

Audit Recommendation Follow-Up

OIG will obtain updates on implementation status for all outstanding audit recommendations and determine an effective means of publicly reporting these. This project was on OIG's workplan for 2022, however staffing limitations and priority audits limited the extent to which follow-up could be conducted.

Recurring Projects

Chapter 14.12 Collection of Information for Law Enforcement Purposes

Pursuant to Seattle Municipal Code (SMC) 14.12.330, OIG determines whether SPD is complying with Chapter 14.12 regarding the collection of private sexual information and other restricted information, including religious and political affiliation. Audits of SPD compliance with Chapter 14.12 are required bi-annually. OIG is currently completing a follow-up of the office's original audit of Chapter 14.12, and the report is anticipated to be issued in 2023.

Annual Surveillance Usage Reviews

Pursuant to SMC 14.18.060, OIG conducts an annual review of SPD use of surveillance technologies. Annual reviews of the technologies used in the previous year are due each September. Currently, there



are 10 approved technologies to review. Eight of these technologies were due for issuance of initial reviews in 2022; however, due to limited capacity, OIG requested and City Council approved an extension of these reports' due date to March 2023.¹ Technologies scheduled to be reviewed in 2023 are:

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- CopLogic
 - Computer Aided Dispatch (CAD)
 - Forward Looking Infrared Real-Time Video (FLIR)
 - 911 Logging Recorder
 - Situational Awareness Cameras Without Recording
 - Video Recording Systems (Cameras in SPD facilities)
 - Automated License Plate Readers (ALPR)
 - Parking Enforcement (Including ALPR)
 - Audio Recording Systems (Wires)
 - I2 iBase
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2023 New Performance Audits and Reviews

Audit of Community Safety and Communications Center (CSCC)

OIG will examine issues around the transition of the 911 call center from SPD to the Community Safety and Communications Center (CSCC) and consider other areas of community concern such as call assignment, dispatch protocols, response times, crisis and equity training, and disparate impact analysis.

Audit of Taser Effectiveness

OIG will examine prior SPD taser deployments to assess their historical effectiveness as a less-lethal tool. This audit may include analysis of Neuromuscular Incapacitation (NMI) rates, how often taser deployment is a significant factor in resolving conflict, and assessment of policies and training related to tasers.

¹ In 2022 OIG hired one full-time staff to begin work on surveillance reviews and contracted with an external consultant to assist in performance of the pending surveillance usage reviews. OIG will be hiring an additional full-time surveillance analyst in early 2023.



III. Policy Work

OIG policy work utilizes a data-driven approach to increase the organizational effectiveness and efficiency of Seattle's public safety and accountability system, with a focus on projects that impact community trust and support racial justice and diversity. OIG utilizes statistical, analytical, and process-mapping expertise to support its mission and to inform decision-making processes.

Ongoing Projects

Sentinel Event Review

In 2021 OIG began a community-centered Sentinel Event Review (SER) of 2020 mass demonstrations in Seattle. A sentinel event is a significant negative outcome, such as a death or serious injury, which signals the existence of systemic problems. A sentinel event review seeks to identify root causes of the negative event in order to prevent its recurrence.

Wave 2 through 4 Reports OIG is conducting SERs of four waves of critical protest incidents; the first report covering the first wave was released in July 2021. Two subsequent reports were released in 2022. Additionally, the Wave 4 Panel Review was completed in 2022. The Wave 4 Report is expected to be published in the first quarter of 2023.

OIG will continue to develop and adapt the Sentinel Event Review process and include community in review of other significant issues. In 2023, OIG will develop a SER Panel review of officer involved shootings of persons in crisis.

Minor Traffic Stops Workgroup

In May 2021, the IG sent a letter to Police Chief Diaz encouraging SPD to explore alternatives to traffic enforcement by reducing reliance on routine stops for civil and non-dangerous violations.² OIG will continue its work on reimagining traffic stops in 2023 and will review implementation of the recommendations that came out of the 2021 letter.

Effective Interviewing

OIG will continue to engage with Dr. Griffiths, SPD, and OPA on training for effective interview techniques, and to develop supporting policies. Policy work will include ongoing efforts to address the use of deception by SPD officers in investigations.

Data Collaborations

OIG collaborates with police accountability system partners (CPC, OPA, and SPD) to standardize and provide public access to data used by SPD, OPA and OIG for analysis. The SPD Data Analytics Platform (DAP) is a data warehouse drawing from multiple systems of records within SPD. In 2022, OIG worked with SPD to increase data transparency and accessibility of data and processes. There are many opportunities for the development of meaningful data dashboards in DAP that can increase oversight ability and efficiency in 2023.

² <http://www.seattle.gov/Documents/Departments/OIG/Other/OIGDiazLetterMinorTrafficOffenses051821.pdf>



Recurring Projects

State Legislative Agenda

OIG issues recommendations on the City's State Legislative Agenda (SLA) each year.³ OIG's priorities are determined by assessing themes in OIG work throughout the year to identify areas where legislative efforts may be necessary to improve systems of policing. OIG recommendations are also supported by considering laws, practices, and stakeholder concerns, locally and nationally.

Trends in Inquests, Claims and Lawsuits

OIG annually reports data on inquests, claims, and lawsuits alleging police misconduct.⁴ OIG works with city agencies to identify data sources, partnerships, and methods to collect and analyze relevant data. Such data provide an opportunity for future trend analysis.

Study of OPA Sworn and Civilian Staff

OIG is charged with annually examining the impact of OPA's civilianization efforts on OPA processes and outcomes for complaint investigation.⁵ In 2022, OIG designed a cross-jurisdictional review of staffing and police misconduct allegations. Results from those interviews were compiled and current findings are being analyzed. Additionally, OIG is compiling a literature review of best practices for civilianization. OIG will develop an assessment to compare civilian and sworn hires to see if any measurable difference exist between their investigations, decisions, and past affiliations.

2023 New Projects

Monitoring Assessments of SPD

OIG is currently developing a methodology to facilitate the transfer of SPD assessments from the DOJ monitoring team to OIG. OIG will work with SPD and stakeholders to ensure these assessments are meaningful, uphold and continue the gains made under the consent decree, and foster transparency.

Mapping Use of Force

In 2019 OIG created a detailed process map of the SPD disciplinary system as part of OIG's ongoing efforts to provide transparency to the public about SPD operations.⁶ This map led to OIG's 2021 audit of the SPD disciplinary system.⁷ A visual mapping of the Use of Force (UoF) incident handling process, checks and balances, and decision-making steps would provide similar transparency and utility for investigation and review of force.

Use of Deception in Public Safety

In 2022, OIG facilitated roundtables with stakeholders and SPD to discuss the use of deception in public safety. The focus of these roundtables was the use of deception in patrol activities. This discussion resulted in recommendations and feedback from the roundtable and the OIG. In 2023, OIG will continue work on the use of deception in public safety with a focus on interviews and interrogation.

³ This project is mandated by Ordinance 125315.

⁴ This project is required by Ordinance 125315.

⁵ This work is required by Ordinance 125315.

⁶ <http://www.seattle.gov/oig/policy/spd-disciplinary-process-roadmap>

⁷ <http://www.seattle.gov/Documents/Departments/OIG/Audits/AuditofDisciplinarySystemforSPDSwornPersonnel.pdf>



IV. Investigations and OPA Review

With both OIG and OPA being civilian-led, OIG acts as a double safeguard to ensure investigations are conducted properly and the OPA Director has the information needed to reach fair findings of fact and issue recommendations on disciplinary outcomes. In that capacity, OIG reviews OPA investigations and certifies them for timeliness, thoroughness, and objectivity. The OPA Director then issues findings and recommendations to SPD based on the results of the OPA investigation. In addition, OIG reviews OPA classification decisions for new cases on a weekly basis so feedback can be provided to OPA in real time and classifications can be changed, if appropriate. OIG evaluates handling of complaint intake to ensure no allegations have been missed. OIG also has a charge to review OPA and SPD for systemic issues of concern; work on systemic matters occurs on multiple fronts throughout OIG's audit, policy, and OPA case review functions.

Recurring Work

Case Certification and Classification Review

OIG conducts individual reviews of OPA investigations and weekly reviews of classifications.

Programmatic Reviews

OIG assesses OPA programs that offer alternative responses to addressing complaints. Presently, work in this area is captured in the OIG annual report. In 2023, OIG will refine and document its processes for regular review of OPA programs and begin quarterly reporting of these reviews.

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- Bias reviews closed out by OPA - Bias Reviews are one of two primary methods by which biased based policing allegations against SPD are resolved (the second method are complaints filed directly with OPA). All bias reviews completed by SPD supervisors in the field are submitted to OPA for final review before being closed out.
 - Mediation - OPA may offer Mediation to Complainants and Named Employees to resolve disagreements, particularly those involving possible miscommunication or misperception, with the guidance of a neutral third party. When accepted by both parties, mediation is the final resolution of the case.
 - Rapid adjudication - Rapid Adjudication is available in certain circumstances for employees who acknowledge their behavior was inconsistent with policy and are willing to accept discipline without undergoing a full investigation by OPA. OPA submits cases to OIG for review prior to final classification.
 - Management Action Recommendations – As one potential case outcome, OPA may issue recommendations for systemic policy or training improvements when the OPA Director identifies a potential deficiency.
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2023 Projects

OIG Case Management System

During the latter part of 2022, OIG developed a Case Management System that was completed in December. OIG will begin working with this system in January 2023, with an emphasis on refining its functions and capabilities to best suit the needs of the office and the public.

OIG Reporting on OPA review

For 2023, OIG will begin quarterly reporting on its classification and contact log reviews and semi-annual reporting for OIG case reviews. This is intended to provide increased transparency of OIG review of OPA operations.

Staff Training

Having completed investigation/interviewing training for OIG staff in 2022, OIG will continue to emphasize training for its OPA review staff regarding investigation and interviewing techniques and best practices. OIG will also begin work on developing robust onboarding and training materials for future new staff.

OIG Website Dashboard

OIG will create a navigable dashboard on its website to allow complainants to track the status of complaints OIG is investigating.



V. Strategic Leadership, Outreach, and Partnerships

Strategic work is performed by the Inspector General in order to further the goals of OIG, represent the expertise of OIG in stakeholder activities, and participate in Consent Decree sustainability efforts as OIG prepares to assume the role of the federal monitor. The IG conducts outreach to inform community about OIG work and develops partnerships with community and other stakeholders to ensure that OIG work products are relevant and reflect public concern.

The IG at her discretion maintains a monitoring presence at significant use of force scene investigations and at the SPD Force Review Board that meets on a weekly basis to review significant uses of force.

Work product requirements coordinated by OIG Operations include production of the Annual Report, annual Work Plan, annual Mid-Year Report, and ongoing public disclosure request responses. In addition to the annual work plan and annual report, the IG produces memoranda and correspondence, including alert letters, throughout the year on emerging issues identified as matters of immediate concern by the IG, or sometimes at the request of Councilmembers, the Mayor, or in response to a request for independent technical assistance



VI. Horizon Project Areas

Horizon topics arise from existing work and the same sources that inform OIG risk assessment and strategic planning for its annual work plan. These are topics OIG has identified for review, but due to resource limitations or other environmental factors are not anticipated to be actionable this year.

SPD Hiring Practices Review

Appropriate hiring practices within in the SPD is a matter of public concern. Increasing transparency in the recruitment and hiring of officers can contribute to an increase in legitimacy with the community. OIG would assess the SPD recruitment process, minimum qualifications, employment screening tools, and any barriers to hiring.

SPD Response to Hate Crimes

CPC has expressed repeated interest in an audit of SPD response to hate crimes, including review of potential bias in investigations and interviews of hate crime victims. OIG concurs that this is a matter of priority and will continue to assess opportunities to follow up on the work performed by the City Auditor in their two-part review of hate crime response issued in 2017 and 2019.

Discipline Follow-up

In November 2021 OIG issued an audit of the disciplinary system for SPD sworn personnel. Some areas of the disciplinary system could not be fully assessed at the time due to a lack of data, such as the outcomes of disciplinary grievances and compliance with new state laws regarding decertification. OIG will continue to monitor such areas of the disciplinary system for an effective time to review.

Overtime and Personnel Management

The ability to reliably track and report on employee hours, including the assignment and fulfillment of overtime hours, is crucial to ensuring public dollars are spent efficiently and appropriately. Use of overtime and personnel management emerged as risk areas through the SER process and discipline audit, and public concern over high wages paid to SPD personnel without adequate documentation. OIG is currently conducting an audit of SPD's Leave Administration, which examines related controls and systems and may inform later work in this area.

SPD Contracting and Purchasing

Appropriate use of City funds, particularly on items of major monetary value or related to critical areas such as training, is intrinsically connected to SPD's ability to provide transparent, efficient, effective public safety to community. Prior OIG projects have encountered potential issues with the accuracy and completeness of SPD contract records.



VII. Inter-Agency Requests

OIG requests input from stakeholders when establishing the annual work plan. OIG responses to such requests fall into the following categories:

1. **Accept** – OIG will undertake a project on the topic in the current year;
2. **Assess** – OIG will take a preliminary assessment of the subject and evaluate it as a potential future project;
3. **Deferred** – OIG recognizes that the topic is appropriate for OIG oversight, but reasons exist why it is not feasible to perform in the current year, e.g., availability of sufficient data, OIG resource constraints, etc.;
4. **Declined/Referred to Other Agency** – OIG will refer to this work to a more appropriate agency, with reason given.

Council Requests

Public Safety Chair Herbold has requested two items for OIG review:

1. [Review of How SPD Evaluates Candidates Applying at SPD for Possible White Supremacist or Extremist Ties.](#)

This was a request made in relation to CPC's 2022 request that OIG evaluate rates of white supremacy in SPD. Councilmember Herbold requested that in addition, OIG evaluate the thoroughness of background searches of SPD candidates, including their social media activity.

OIG Response: [Deferred] OIG has added a review of SPD hiring practices to the 'Horizon Projects' in this workplan due to staffing limitations. This assessment may include the SPD recruitment process, minimum qualifications, and employment screening tools including backgrounding and social media activity.

2. [Review of OPA Actions Taken to Address Findings in 2021 User Survey](#)

This request cites the 2021 OPA report [Complainant Experience: Report & Recommendations](#)

OIG Response: [Assess] OIG will request information from OPA on the status of actions taken to address findings. These actions, along with actions taken to implement recommendations made to OPA in the 2021 Discipline Audit, may form the basis for future work related to complainant experience.

Community Police Commission Requests

For 2023, CPC's requests were generally follow-up items to requests from last year. However, among these, the CPC identified three items for OIG to perform new work in.

1. [Review or Audit 911 Dispatch Center](#)

CPC expressed that 911 dispatch remains their top priority for the OIG workplan in 2023. In addition to what is included in the 2022 OIG Work Plan, CPC requested that OIG begin a specific project related to the October 19, 2022, death of D'Vonne Pickett, Jr., and errors made by CSCC



dispatchers in dispatching police and fire to the wrong location, resulting in the delay of lifesaving care to Mr. Pickett.

OIG Response: [Accept] *OIG has added an audit of the Community Safety and Communications Center to the 2023 workplan.*

2. Improve SPD Disciplinary Process

In 2022, CPC requested that OIG collaborate with SPD to improve its disciplinary process. Specifically, CPC asked OIG to assess what process is in place to ensure officers are not repeat offenders regarding misconduct and officer-involved shootings. CPC asked OIG to conduct an audit of officers involved in multiple officer-involved shootings to determine if there is a pattern in the cases that produce repeated involvement. In 2023, CPC requested, in addition, a follow-up of the status of OIG's discipline audit from November 2021.

OIG Response: [Accept/Assess] *OIG has placed audit recommendation follow-up on the 2023 workplan. Recommendations from the Discipline Audit will be included in this effort.*

As it concerns an evaluation of officers repeating misconduct or who are involved in multiple officer-involved shootings, OIG is assessing how best to evaluate SPD's early-intervention system which is intended to identify such officers for appropriate intervention. Assessment of SPD's early-intervention system is one component of OIG's assumption of monitoring duties from the DOJ.

3. Audit of SPD Supervision

In 2022, CPC requested that OIG conduct an audit of SPD supervision to evaluate consistency in supervisory duties and training across Seattle, as well as examine accountability for supervisors. Specifically, CPC asked that OIG focus on supervisory reporting and discipline in the field. In 2023 CPC requested a follow-up of the supervision components of OIG's projects.

OIG Response: [Accept] *Rather than a unified audit of SPD supervision, OIG has incorporated elements of supervision into audits it has conducted, namely the canine and discipline audits, and will continue to do so in future projects. Additionally, supervision is a key element in the monitoring duties OIG will be assuming.*

OIG will provide an update on the status of prior recommendations related to supervision, among other topics.

Office of Police Accountability Requests

1. Use of Frontline Investigations

OPA reports that they would benefit from a data-driven understanding of the present use or disuse of Frontline Investigations to address minor misconduct. (SPD Manual 5.003 – Front Line Investigations). As OIG noted in the 2021 Discipline Audit, this process was explicitly provided for in policy but is seldom used. Specific areas of inquiry could include the number, types, and provenance of OPA complaints that could be appropriately handled as frontline investigations.



***OIG Response: [Deferred]** OIG agrees that the apparent under-utilization of Frontline Investigations may represent an opportunity for greater efficiency within the disciplinary system that is worth evaluating. However, this is an area that may be impacted by ongoing collective bargaining and OIG will wait to assess what work may be done at a later date.*

2. Audit of Chain of Command Responses to Supervisor Actions Issued by OPA

OPA relies on both Supervisor Actions and Training Referrals, as indicated by the OPA Manual, to address minor misconduct, possible misconduct, and systemic/training/performance issues. OPA views these as important tools to promote accountability, improve SPD performance, and increase public trust. However, OPA would appreciate a data-driven understanding of how the chain of command presently follows through on supervisor actions. This was identified as an area for “future follow-up” in OIG’s 2021 Audit of Disciplinary System for SPD Sworn Personnel.

***OIG Response: [Assess]** OIG agrees that the results of supervisor actions and training referrals are important to assess as they make up a significant portion of how misconduct allegations are resolved. There is little objective data related to the outputs and outcomes of supervisor coaching conversations in general; however, OIG plans to conduct an assessment of the Force Review Board as part of its monitoring duties, and a portion of that assessment will examine how the chain of command acts on recommendations that come from the Board. We will assess if responses to supervisor actions and training referrals can also be evaluated as a part of this work.*

2023 Work Plan Timelines

Project	Beginning	End
AUDITS AND REVIEWS		
Ongoing Projects		
Audit of Youth Miranda Rights	Q3 2022	Q2 2023
Audit of Leave Administration	Q3 2022	Q3 2023
Audit of Mutual Aid	Q3 2019	Q3 2023
2022 Annual Surveillance Usage Reviews (8 Technologies)	Q3 2022	Q1 2023
Recurring Projects		
Chapter 14.12 (Follow-up to 2019 audit)	Ongoing	Q1 2023
Chapter 14.12 2023 First Biannual	Q1 2023	Q2 2023
Chapter 14.12 2023 Second Biannual	Q3 2023	Q4 2023
Recommendation Follow-up	Q2 2023	Q3 2023
2023 Annual Surveillance Usage Reviews (10 Technologies)	Q1 2023	Q3 2023
New Projects		
Audit of Community Safety and Communications Center	Q2 2023	Q1 2024
POLICY PROJECTS		
Ongoing Projects		
Sentinel Event Review - Waves 2 through 5	Q2 2020	Q1 2023
Recurring Projects		
State Legislative Agenda	Ongoing	Ongoing
Annual Trends in Inquests, Claims and Lawsuits	Q1 2023	Q4 2023
Annual Study of OPA Sworn and Civilian Staff	Q1 2023	Q4 2023
2023 Projects		
Monitoring assessments	Q3 2022	Ongoing
Mapping of Use of Force	Q1 2023	Q4 2023
Use of Deception in Public Safety	Q2 2022	Q4 2023
INVESTIGATIONS AND OPA REVIEW		
Recurring Projects		
Case certification and classification review	Ongoing	Ongoing
Quarterly report on OPA classification and contact logs	Q2 2023	Quarterly
Semi-annual report on OPA review	Q3 2023	Q3 2023
2023 Projects		
Staff training	Q1 2023	Q4 2023
Onboarding/new staff training program	Q2 2023	Q4 2023
OIG case management system refinement	Q1 2023	Ongoing
OIG website dashboard	Q1 2023	Q3 2023
OTHER DEPARTMENTAL RECURRING WORK		
Annual Work Plan	Q4 2023	Q4 2023



OIG & CPC Mid-Year Report	Q3 2023	Q3 2023
Annual Report	Q1 2023	Q2 2023
Consent Decree and Monitoring Plan Work Items	As needed	As needed
Emerging Issues Memoranda	As needed	As needed
Public Disclosure Requests	Ongoing	Ongoing