

IMPLEMENTATION OF RECOMMENDATIONS MADE BY 21CP FOR THE PORT OF SEATTLE POLICE DEPARTMENT

Implementation Progress Report 4

May 21, 2026



21st Century
Policing Solutions

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Port of Seattle Task Force on Policing and Civil Rights

In 2020, the Port of Seattle (the “Port”) engaged 21st Century Policing Solutions (“21CP”) to conduct a comprehensive assessment of the Port of Seattle Police Department’s (“POSPD” or the “Police Department”) policies, protocols, and procedures impacting issues of diversity, equity, and civil rights.¹ The Port of Seattle Commission (the “Port Commission”) created a Task Force on Port Policing and Civil Rights (the “Task Force”) to design a structure and process for 21CP to use in assessing the POSPD regarding diversity in recruitment and hiring; training and development; equity; use of force; oversight and accountability; police union participation; budget, roles, and equipment; mutual aid; and advocacy. As detailed in the September 2021 assessment report, *Recommendations for the Port of Seattle Task Force on Policing and Civil Rights* (“Recommendations Report”), 21CP made 52 recommendations for ways the POSPD could better align itself with best and promising practices.²

In 2023, the POSPD contracted with 21CP to conduct a review each year of a four-year period, 2023 to 2026, to audit the POSPD’s progress in implementing 21CP’s 52 original recommendations. 21CP has shared its findings in an implementation issued each year to facilitate accountability and transparency regarding POSPD’s process and outcomes in its consideration of 21CP’s recommendations.

Policing Assessment Recommendations Review

After 21CP submitted its 2021 Recommendations Report, the Port’s Office of Strategic Initiatives (“POSI”) organized a group of Port and POSPD representatives with subject matter expertise related to potential impacts in implementing 21CP’s recommendations. The Policing Assessment Implementation Team (“PAIT”) included the Port Chief Operating Officer, the POSPD (then Acting) Chief, the Port Chief Strategy Officer; staff from POSPD’s Finance and Budgeting and Training, Hiring, and Recruitment; and representatives from the Port’s Offices of Labor Relations, Human Resources, Workplace Responsibility, and Legal.³

¹ The engagement was framed by the July 14, 2020, Port Commission Motion 2020-15.

² The Recommendations Report includes a complete description of the approach the Task Force created for the assessment, a summary of 21CP’s methodology to gather and analyze information, and a description of the many ways Task Force members, 21CP, and the POSPD collaborated throughout the engagement. 21CP’s report can be accessed at:

<https://www.portseattle.org/sites/default/files/2021-10/Recommendations%20for%20the%20Port%20of%20Seattle%20-%2021CP%20Solutions%20-%20September%202021.v2.pdf>.

³ PAIT meetings were held every three weeks to consider each of 21CP’s 52 recommendations. The group discussed implementation implications regarding budget, policy, community/external relations, and legal concerns for the POSPD and Port. Each recommendation was classified as being of high, medium, or low priority based on factors such as whether a recommendation concerned a matter where Washington State law imposed related requirements, and thus needed to be addressed expeditiously, or whether a recommendation required more extensive consideration and coordination between POSPD and other Port components, and could not be implemented quickly.

The PAIT team's discussion about each recommendation was synthesized on a form that included the recommendation, its priority level, the recommendation's area of focus (*e.g.*, Use of Force, Diversity in Recruitment and Hiring, etc.), the recommendation's implementation status, and PAIT's insights on implementation implications. These impact statements and a description of PAIT's structure and process were collected in a document titled "Policing Assessment Recommendations Review" ("PAIT Review"). Summaries of PAIT's perspectives are included below in the discussion of each of the recommendations considered for 2026.

After 21CP submitted its implementation progress reports in 2023 and 2024, Bookda Gheisar, Senior Director Office of Equity, Diversity, and Inclusion ("OEDI") and a co-leader of the Task Force the Port Commission created to help guide 21CP's original assessment, was asked by Port leadership to provide support for 21CP's annual review and feedback on 21CP's implementation progress reports. Senior Director Gheisar formed the Policing Assessment Implementation Review Committee ("Review Committee"), bringing together Port subject matter experts from the Police Department, Human Resources, Labor Relations, External Relations, and other operating divisions, along with external stakeholders. Many individuals on the Review Committee also were involved with the Task Force during 21CP's assessment and with the PAIT review team, including Delmas Whittaker, Chief Operating Officer Maritime Division, who served as co-leader of the Task Force. In each of the 2025 and 2026 reporting periods, 21CP met with Senior Director Gheisar and others on the Review Committee to gain their perspectives regarding specific recommendations and 21CP's implementation progress reports. Discussions have primarily focused on recommendations related to Human Resources protocols.⁴ Input from the Review Committee is noted below when relevant to the discussion of specific recommendations. Pursuant to the protocol developed between the Police Department and OEDI, after 21CP submits its annual progress report to POSPD, the Police Department provides OEDI with a copy of the final report, and the Review Committee can submit its observations to the Port Commission about the implementation progress being made.⁵

21CP's Process for Reviewing Implementation of Recommendations

As occurred in each of the past three years, the Police Department identified a subset from 21CP's original list of 52 recommendations to consider for implementation in 2026. The 2026 subset included the final 12 recommendations remaining after implementation progress made in 2023, 2024, and 2025.

⁴ 21CP's uses an Excel spreadsheet to track implementation of all 52 recommendations, color-coded by the year under review, and including 21CP's notes on its initial findings and whether further documentation or follow-up interviews were necessary to clarify the status of implementation for each recommendation under review. 21CP and Commander Depolo regularly provided updated copies of the spreadsheet to Senior Director Gheisar and others on the Review Committee.

⁵ If the Review Committee suggests implementation actions not addressed by POSPD or 21CP's progress reports, the suggestions are to be included in POSPD's annual EDI goals, separate from 21CP's implementation review process.

Following the same process used in prior implementation reviews, for each of the 12 recommendations considered in 2026, POSPD initially provided a written offer of proof, which usually involved a memorandum summarizing POSPD's actions regarding implementation or an explanation as to why a recommendation was no longer relevant or would not be implemented for other reasons. Draft policy changes, email communications with subject matter experts, and other supporting material may also be included with POSPD's written offer of proof. 21CP's point of contact at the POSPD throughout the 2026 review process was Commander Andrew Depolo, Office of Professional Standards and Development.

Based on the initial written proof of implementation, 21CP made preliminary findings that it shared with the Police Department and the Review Committee as to whether satisfactory evidence was provided in support of implementation for each recommendation. If clarification or more information was needed concerning a recommendation, 21CP sought input from Commander Depolo and other POSPD and Port subject matter experts, including members of the Review Committee.⁶ Port and POSPD representatives all readily provided information and their perspectives on the recommendation implementation topics under review, offered to make themselves available for follow-up questions, and suggested other resources when relevant. A summary of the documentation reviewed, input from individuals interviewed, and PAIT's perspective is provided below in the discussion of each of the 12 recommendations considered in 2026.

RECOMMENDATIONS REVIEWED FOR IMPLEMENTATION IN 2026

This section discusses 21CP's review and finding for each of the 12 recommendations considered during this fourth and final reporting period. Satisfactory evidence of implementation was provided regarding four recommendations (Recommendations 9, 40, 48, and 51). Regarding another four recommendations, implementation was considered but rejected (Recommendations 3, 28, 30, and 43). The Port and POSPD have made good progress on implementing the remaining four recommendations (Recommendations 31, 32, 33, and 37), though more time or other resources are needed before implementation can be fully realized.

Recommendation 3 - General Communications

The Port should consider creating a quarterly Port safety committee to bring interested stakeholders together.

The discussion in 21CP's Recommendations Report related to Recommendation 3 notes that POSPD's "community" is "primarily the Port itself."⁷ The organization is comprised of the Seattle-Tacoma International Airport and various Puget Sound maritime entities (cargo shipping, cruising, commercial

⁶ When implementation resulted in training, such as when extensive use of force policy changes were made following new Washington State requirements and in response to 21CP's recommendations, 21CP had the opportunity to observe the updated training.

⁷ Recommendations Report, 14.

fishing, etc.), overseen by the Port of Seattle Commission and supported by internal operating divisions and a host of business enterprises. Recommendation 3 was intended to support an overarching goal to facilitate transparency and critical self-analysis concerning POSPD policing services, capitalizing "on the work of Port employees [involved with the Task Force]...and to continue that effort with other Port employees....," including representatives of Port Employee Resource Groups ("ERGs").⁸

PAIT found Recommendation 3 to be of low priority and suggested that the recommendation not be implemented before clarifying the function of a safety committee. The PAIT Review notes indicated that, depending on the ultimate function of the committee, internal operating divisions at the Port and employee groups – including Human Resources, ERGs, and Health and Safety – should be consulted. PAIT also noted that a group could be formed to educate ERGs on the importance of participating on POSPD oral boards, that the function of SEA Cares⁹ could be expanded to take on the duties of a safety committee, and that it would be necessary to determine the level of security clearance required for committee participants.

As an offer of proof regarding POSPD's consideration of Recommendation 3, the Police Department provided a memorandum dated January 20, 2026, from Commander Depolo, outlining steps taken by POSPD to engage the Port community across a variety of platforms since 21CP completed its assessment. Also provided were copies of surveys being used with airport, airline, and marine internal stakeholders, and with individuals who contact the department for service. When 21CP had questions regarding the surveys, the POSPD shared emails describing how the surveys are used and copies of sample monthly reports based on survey results. Finally, Commander Depolo also submitted a copy of the Trespass Reduction Crime Prevention and Safety Plan developed by POSPD and SEA Cares, dated December 2021.

POSPD does not intend to implement Recommendation 3 by creating a Port safety committee. It asserts that the many meetings and focus groups regularly held to enhance two-way communications and engage with the Port community, along with collecting survey data from internal and external stakeholders, meets or exceeds the intent behind the recommendation. For example, the Police Department separately meets on a quarterly basis with Airport Dining, Retail, and Rental Car Facility stakeholders, and attends standing meetings with Seaport stakeholders, including the United States Coast Guard Area Marine Security Committee ("USCG AMSC") Advisory group. Monthly meetings are held with each of the following: Emergency Management Tabletop, Seattle Joint Area Operations Group, and Maritime Security representatives. In addition, POSPD meets on a weekly/biweekly basis with the Port's cornerstone tenants, Alaska Airlines and Delta Airlines, and attends the Cruise Operations Security meeting on a seasonal basis.

⁸ Ibid.

⁹ The SEA Cares task force was comprised of stakeholders and community groups who came together to address a variety of problems surrounding the issue of unhoused individuals frequenting SeaTac Airport and is discussed further below.

As described by Commander Depolo in his memorandum and during follow-up meetings, other examples of stakeholder engagement provided by POSPD include:

- **STAMA/ISTAMA** - The Station Manager/International Station Manager (STAMA/ISTAMA) series is a monthly meeting involving nearly every group doing business in or around the airport, including air carriers, ground handlers, Federal agencies, and the Port. A member of POSPD's Leadership Team, typically a Commander, attends STAMA/ISTAMA meetings and time is allocated for presenting topics of interest or for Q & A. For example, in February 2026, the Police Department's Special Operations Bureau presented on POSPD's enhanced visibility patrols.
- **LEO/Security "Coffee Klatch"** - Weekly meetings take place among airport safety and security operations employees, including representatives from POSPD, DHS (specifically, TSA and Federal Air Marshalls), Aviation Security, Aviation Operations, FBI/JTTF, and corporate security from major airline tenants. The meetings provide an opportunity to share information and address minor issues before they become more problematic.
- **Port of Seattle EDI Change Team** - The Change Team is a Port-wide cohort of employees from all departments, teams, and leadership levels, with the mission to engage all levels of the Port in using an equity framework on a daily basis. Multiple POSPD Commanders, Sergeants, and Officers have worked with the group and participated on subcommittees focusing on equity issues. Change Team meetings "were vital in the post George Floyd era to build bridges with multiple Port communities and to demonstrate POSPD's commitment to fairness and equality."¹⁰
- **SEA Cares** - The SEA Cares task force was comprised of stakeholders and community groups who came together to address a variety of problems surrounding the issue of unhoused individuals frequenting SeaTac Airport. POSPD developed a Trespass Reduction, Crime Prevention, & Airport Employee and Visitor Safety Strategy ("Trespass Reduction Strategy") in conjunction with SEA Cares, with near term, short term, and long term objectives for January 2022 to December 2025. As part of this effort, POSPD piloted a Crisis Coordinator position whereby a commissioned officer would respond to calls involving non-ticketed persons trespassing at the airport, for the purpose of providing information on mental health and shelter services as an alternative to arrest. The Police Department has since added one mental health professional and is in the process of adding a second.¹¹

POSPD also provided copies of the survey used with airport, airline, and maritime internal stakeholders, along with the daily post-contact customer service survey used for specific call types. The Police Department indicated that the surveys are used to collect feedback on measures such as communication,

¹⁰ Memorandum dated January 20, 2026, from Commander Andrew Depolo, Office of Professional Standards and Development, regarding Recommendation 3, 2.

¹¹ POSPD indicated that the Trespass Reduction plan has been successful in lowering the number of unhoused people at the airport.

collaboration, responsiveness, conduct, and professionalism, with reports generated to summarize the input received.¹²

Though the Port has not created a quarterly Port safety committee as recommended by 21CP, POSPD maintains that it "has met the spirit of the recommendation by near constant collaboration"¹³ with stakeholders.

Overall, satisfactory evidence was presented to 21CP that Recommendation 3 was considered and that the Police Department determined that implementation was unnecessary.

Recommendation 9 - Use of Force Policy: Generally

The mission and vision statements in the policy manual should more clearly indicate the department's commitment, in all of its activities, to valuing and upholding equity and fairness, de-escalation, the sanctity of human life, and achieving the best possible outcome for all involved.

At the time of 21CP's assessment, POSPD's Policy Manual included a statement of commitment to recognizing and respecting the value of all human life and dignity without prejudice to anyone, and recognizing the need to monitor, evaluate, and carefully balance all interests with regards to the use of force.¹⁴ However, Recommendation 9 was grounded in 21CP's concern that there were competing sets of value statements elsewhere in the Policy Manual that were inconsistent and potentially concerning.¹⁵

The PAIT review team found this recommendation to be of low priority, suggesting that it not be considered until after the appointment of the next Chief, a process underway in 2022 when this recommendation was considered.¹⁶ PAIT also suggested that the Port's Human Resources and Office of Equity, Diversity, and Inclusion (OEDI) assist with the review when it occurred. PAIT review notes indicated that the POSPD mission statement was updated in 2019, though acknowledged that there were different approaches taken with value statements elsewhere in the manual. PAIT suggested that clarifying POSPD's stance on equity would be beneficial and that the OEDI offered to work with the Police Department on inclusion of equity in its mission statements.

¹² The POSPD is using the AXON My90 platform to collect survey data. See <https://www.axon.com/resources/my90-data-highlights-community-feedback>.

¹³ Memorandum dated January 20, 2026, from Commander Andrew Depolo, Office of Professional Standards and Development, regarding Recommendation 3, 2.

¹⁴ Recommendations Report, 50.

¹⁵ Ibid. Specific examples are detailed in the Recommendations Report.

¹⁶ Mike Villa was selected as Chief of Police in 2022, though is now retiring. Deputy Chief Sean Gillebo began serving as Interim Chief on or about April 20, 2026.

Documents included with the Police Department's offer of proof to 21CP included revised language in the Chief's Preface to the POSPD Policy Manual, email exchanges between Deputy Chief Sean Gillebo, Commander Depolo, and Officer Scott Colby regarding options for changes to POSPD's use of force policies in response to Recommendation 9, updated copies of POSPD Policy 307.2.1 and Policy 307.3, and a copy of POSPD Policy 307 - Use of Force, with changes highlighted, along with revisions resulting from changes in Washington State law, in response to other 21CP recommendations regarding use of force, and in compliance with the Commission on Accreditation for Law Enforcement Agencies ("CALEA").¹⁷ Following interviews, 21CP requested and received copies of the Chief's Preface and Vision and Purpose statements in the Policy Manual with tracked changes indicating revisions made in response to Recommendation 9.

The Chief's Preface in the POSPD Policy Manual includes a statement that the department promotes, "world-class professional law enforcement services, fair processes, the sanctity of human life, and the rights guaranteed by our state and nation's constitutions. [The department's policies] enable our members to achieve the best possible outcomes for all involved." The new language appears responsive to 21CP's Recommendation 9.

Policy 307, Use of Force, was previously revised in response to the Washington State Attorney General's Model Use of Force Policy Project and 21CP's other recommendations related to use of force, most of which were addressed in earlier implementation progress reports.¹⁸ In consideration of Recommendation 9 and requirements in the AGO's Model Use of Force Policy, POSPD's Policy 307.2 also was revised and includes language in line with that suggested in Recommendation 9. For example, Policy 307.2 includes the following statements:

- It is the fundamental duty of law enforcement to preserve and protect all human life (RCW 10.120.010). Officers shall respect and uphold the dignity of all persons and use their authority in a bias-free manner.
- The proper use of force is essential to ensure impartial policing and build trust in the community. While there are circumstances where individuals will not comply with the law unless compelled or controlled by officers through the use of force, officers must remain mindful that they derive their authority from the community and that unreasonable force degrades the legitimacy of that authority (Washington State Office of the Attorney General Model Use of Force Policy).

¹⁷ POSPD is one of six law enforcement organizations accredited by CALEA in Washington State. It has been accredited by CALEA since 2011.

¹⁸ The Washington State Legislature required the Attorney General's Office (AGO) to develop a model policy on law enforcement use of force and de-escalation tactics consistent with new standards set by the Legislature. A final version of the policy was published on July 1, 2022, and all agencies in Washington were required to adopt the model policy or their own policy consistent with the new standards by December 1, 2022. The AGO's Model Use of Force Policy and related information is available at:

<https://www.atg.wa.gov/law-enforcement-use-force-and-de-escalation>.

Policy 307.2.1, Critical Decision Making, was modified to clarify steps to be taken, when safe and reasonable, in making the decision to contact a member of the public. Pursuant to the AGO's Model Use of Force Policy and in consideration of 21CP's Recommendation 9, Policy 307.2.1 covers factors to be considered in the decision-making process, including de-escalation factors such as requesting a crisis intervention team or other appropriate unit and identifying options for conflict resolution. Referring to the AGO's Model Use of Force Policy, Policy 307.2.1 was also modified to emphasize de-escalation by requiring that officers not unreasonably place themselves or others at risk by:

- Immediately approaching a person without proper evaluation of the situation.
- Leaving insufficient space between an officer and the person.
- Not providing time for a person to comply with commands when feasible.
- Unnecessarily escalating a situation.

It appears that the modifications made to Policy 307.2.1 more clearly delineate the Police Department's commitment to de-escalation, and are responsive to Recommendation 9.

Policy 307.2.2, Duty to Intervene, Duty to Render Aid, and Duty to Report, has been modified several times since 2021, in accordance with Recommendation 9. For example, a commitment to upholding equity and fairness and recognizing the sanctity of human life and the goal to achieve the best possible outcome for all involved is reflected in the explicit requirement that officers intervene to prevent the use of unreasonable force, render aid to any person injured as a result of the use of force at the earliest safe opportunity to do so, and requiring that officers report any observation of use of force that is potentially beyond that which is objectively reasonable under the circumstance.¹⁹

Satisfactory evidence was presented to 21CP that Recommendation 9 has been implemented.

Recommendation 28 - Oversight, Accountability, Equity, & Civil Rights

Though there was no evidence of missed timelines for completing investigations, best practice would be to set timelines for each step in the process, from complaint intake through a final disposition, including notice to the named officer and complainant, and the timelines should be reflected in an updated complaint intake flowchart and policy should be clarified as to acceptable reasons for extending timelines, identify who has authority to grant an extension, and note any limits on the length of an extension.

Setting timelines for the various steps involved in complaint processing facilitates accountability for those conducting investigations and transparency about case handling for everyone involved.²⁰ Because events

¹⁹ Modifications made to 307.2.2 are also intended to be consistent with requirements under RCW 10.93.190 and RCW 36.28A.445.

²⁰ Recommendation 25, addressed in Implementation Progress Report 3 (2025), mentions timelines, though primarily focused on the need for the Port and Human Resources to be explicit about those cases to be handled

can arise during an investigation that cause unexpected delays, such as the unavailability of a necessary witness or challenges due to a high investigation caseload, specifying the circumstances under which investigative deadlines can be extended and identifying the person(s) with authority to make extensions is important. Establishing clear policies and procedures regarding timelines, including the process for securing extensions of the typical timelines, serves the goal of efficient case processing, ensures timely discipline or training when needed, and promotes timely resolution of the matter for both the complainant and the named officer.²¹

POSPD's Policy Manual provides that administrative investigations should be completed within 90 days. If an extension is necessary, notice should be given to the involved officer, along with the reason for the extension and the expected timeframe for completing the investigation.²² Although 21CP did not encounter evidence of missed timelines involving internal investigations conducted by POSPD's OPA, concerns were expressed about the length of time taken in some instances by Human Resources' Workplace Responsibility when complaints against POSPD were investigated outside the Police Department.

PAIT rated Recommendation 28 as being of low priority. PAIT Review notes indicated that current POSPD policy provides for a set amount of time for investigations to be completed, with reasons to be given if an extension is necessary. However, POSPD policy does not delineate any timelines other than for completing the investigation, does not identify the person with authority to grant an extension, and only mentions notice to the officer, and not the complainant, if a timeline extension is needed. PAIT understood that Recommendation 40, in part, focused on giving the investigation process more visibility, "providing complainants with information from the outset as to how the investigation will be handled and by whom."²³ As for policy implications, the PAIT Review noted that implementation of Recommendation 28 would require a subcommittee of the Police Department's Office of Professional Accountability and representatives from Human Resources and Workplace Responsibility.

Evidence in support of the Port and POSPD's consideration of 21CP's Recommendation 28 included communications from Commander Depolo, Katie Gerard, Senior Director Human Resources, and Milton Ellis, Assistant Director Labor Relations. Also included was a copy of a memorandum submitted to the Port of Seattle Commission by OEDI Senior Director Bookda Gheisar and POSPD Chief Michael Villa, dated October 10, 2025.

through a POSPD internal investigation verses those that should be referred to and investigated by Human Resources/Workplace Responsibility. Through a collaborative effort between the Police Department and Human Resources, Recommendation 25 was implemented and resulted in the creation of an Investigation Infographic for complaints handled through Workplace Responsibility, though timelines were not set.

²¹ 21CP provided POSPD and the Review Committee with sample copies of law enforcement complaint investigation policies that include timeline expectations.

²² Port of Seattle Police Department Policy Manual (11-24-2025), 1019.5.6.

²³ PAIT Review, 37.

On behalf of the Police Department, Commander Depolo noted that internal OPA investigations are governed by the POSPD Policy Manual and the Officer's Bill of Rights in the Collective Bargaining Agreements for Officers, Sergeants, and Commanders. The Bill of Rights is currently a subject under discussion between Labor Relations for the Port and the Teamsters Union.²⁴ Commander Depolo indicated that the specifics of bargaining could not be discussed but that everyone involved is aware of 21CP's Recommendation 28.

21CP requested and received an updated version of POSPD Policy 1019.5.6 that tracked the changes made. The Spring 2026 Policy Manual Update is slated to be released on May 15, 2026, and will include revised Policy 1019.5.6 that states, "In cases where extenuating circumstances exist, or in cases involving extremely complex or sensitive investigations, the completion due date may be extended by the Office of Professional Accountability (OPA), with the approval of the Chief of Police or designee."²⁵ Commander Depolo indicated that POSPD did not make other policy revisions in response to Recommendation 28 given the on-going bargaining taking place regarding due process components of the Bill of Rights.

Senior Director Gerard, on behalf of the Port of Seattle Human Resources, indicated that when complaints involving POSPD are investigated by Workplace Responsibility, notice is sent to the complainant, subject, and the subject's manager within 10 days of the case being assigned to an investigator.²⁶ While stating that, "Workplace Responsibility endeavors to complete investigations as quickly as possible,"²⁷ Senior Director Gerard indicated that timelines for completion of Workplace Responsibility investigations have not been established. In a follow-up interview, Senior Director Gerard indicated appreciation for some of the advantages in setting timelines, though noted ongoing staffing and other resource challenges make it difficult to predict case processing times.

The October 10, 2025, memorandum submitted to the Port of Seattle Commission by OEDI Senior Director Gheisar and POSPD Chief Villa notes steps taken by Human Resources and the Police Department to improve accountability and transparency regarding complaint investigations, including clarifying which types of complaints are to be investigated by POSPD verses those to be handled by Workplace Responsibility. The memorandum also refers to the ongoing negotiations concerning the Officer Bill of

²⁴ An email dated January 21, 2026, from Assistant Director of Labor Relations Ellis to Commander Depolo, indicated that negotiations to augment or modify due process components of the Bill of Rights, including any complaint investigation timelines that might emerge, emanate from the reopener option in earlier agreements.

²⁵ Email dated April 27, 2026, to 21CP from Officer Scott Colby, Office of Professional Standards, Marine Patrol Unit, and Emergency Vehicle Operations Cadre, that included a copy of Policy 1019.5.6 with changes highlighted and information concerning when the updated POSPD Policy Manual would be issued.

²⁶ Pursuant to changes made in response to 21CP's Recommendation 5, addressed in Implementation Progress Report 2 (2024), the Port and POSPD clarified that complaints involving allegations of discrimination, harassment, or retaliation involving POSPD officers are referred to Human Resources/Workplace Responsibility for investigation, while the Police Department's Office of Professional Standards and Development is generally responsible for overseeing investigations of all other complaints.

²⁷ Memorandum dated January 22, 2026, from Katie Gerard, Port of Seattle Human Resources Senior Director, regarding Recommendation 28.

Rights, discussed above. Recommendation 28 contemplated the potential need for deadline extensions and included the suggestion to clarify the circumstances under which an extension can be granted, though the October 10, 2025, memorandum to the Port Commission from OEDI Senior Director Gheisar and POSPD Chief Villa states that Workplace Responsibility investigations will not include "hard timelines (as they may compromise investigations)..."²⁸

While POSPD policy will address much of what is covered in Recommendation 28, including the overall timeline for conducting investigations and specifying the person with authority to grant extensions and situations when extensions might be necessary, further policy changes are dependent on collective bargaining outcomes. Human Resources has no plan to set investigation timelines, nor address other aspects of Recommendation 28 regarding complaints against POSPD officers investigated by Workplace Responsibility.

Satisfactory evidence was presented to 21CP that Recommendation 28 was considered by POSPD and that some revisions were made, but that the Police Department determined that full implementation was not possible at this time due to collective bargaining taking place regarding due process components of the Bill of Rights. In addition to the bargaining obstacle, the Office of Human Resources determined that implementation would not occur due to budget, staff, and other resource limitations.

Recommendation 30 - Oversight, Accountability, Equity, & Civil Rights

The Port should explore alternative dispute resolution (ADR) options for resolving some complaints, whether or not they involve the Police Department, as ADR does not appear to be an option for case processing in the POSPD, Human Resources, or Workplace Responsibility.

21CP's Recommendation Report noted that, although the number of complaints filed against POSPD officers and other Port employees might not justify the time and expense of setting up an alternative dispute resolution (ADR) program, it would be useful for Human Resources to consider dispute resolution programs.²⁹

PAIT rated Recommendation 30 as being of medium priority, observing that, while ADR is a good intervention tool, it would not replace the complaint investigation process. PAIT Review notes also mention that Workplace Responsibility can assist in identifying the appropriateness of the ADR option and concluded with, "ADR can be very taxing and time consuming, but worth it in the appropriate case."³⁰

²⁸ Memorandum dated October 10, 2025, from Bookda Gheisar, Office of Equity, Diversity and Inclusion Senior Director, and Michael Villa, Port of Seattle Police Department Chief, regarding Police Assessment Implementation Review Committee: Summary of 2025 Review, 3.

²⁹ Recommendations Report, 88.

³⁰ PAIT Review, 40.

As evidence that the Port considered but rejected Recommendation 30, the Police Department provided a copy of a memorandum dated January 22, 2026, from Katie Gerard, Human Resources Senior Director, noting that ADR is not available for complaints of discrimination investigated by Workplace Responsibility. However, ADR is an option through Employee Relations for complaints involving a dispute between two Port employees, including those in the Police Department.

In an interview with 21CP, Senior Director Gerard indicated an understanding of the potential benefits of ADR, though it was not apparent to her that the relatively small number of complaints received would justify the resources necessary to develop a formal internal ADR program. Also, although the Port does not have plans to create an internal ADR system, there are professional mediators throughout the Puget Sound area who could provide dispute resolution services if a complaint under investigation merited ADR consideration.

Note that, while Recommendation 30 mentions that POSPD does not have a formal ADR option either, the Port focused on the merits of developing a program through Human Resources/Workplace Responsibility. This approach apparently was followed because any formal ADR program situated in Human Resources theoretically could extend to complaints investigated internally at POSPD, and because the Police Department's complaint caseload is smaller relative to complaints handled through Human Resources.³¹

Satisfactory evidence was presented to 21CP that Recommendation 30 was considered, but that POSPD and Human Resources will not implement an ADR program due to the relatively low number of complaints involving POSPD personnel and budget, personnel, and other resource limitations.

Recommendation 31 - Oversight, Accountability, Equity, & Civil Rights

There are a number of ways to make the POSPD and complaint filing system more accessible to stakeholders, including modifying the complaint form, changing the on-line search system, and identifying police facilities on Sea-Tac airport maps.

As noted in Implementation Progress Report 3 (2025), a survey conducted during 21CP's POSPD assessment found that most respondents were aware of their options for filing a complaint.³² Nonetheless, Recommendation 31 recognized that there are a variety of ways that the complaint filing system, and Police Department itself, could be more accessible to stakeholders. Consequently, 21CP's Recommendations Report suggested the following:

³¹ Chief Villa indicated to the Review Committee that he has seen ADR implemented successfully in other police departments.

³² Implementation Progress Report 3 (2025), 11. Note that Report 3, along with earlier implementation reports, discuss POSPD's response to other recommendations made to enhance accountability and transparency regarding complaint processing, including development of an infographic that outlines the investigation process followed by Workplace Responsibility.

- The form available on the POSPD webpage refers to "inquiry, commendation, complaint, suggestions, and area of concern," is unnecessarily specific and should be limited to "concern or complaint."
- The online complaint form should provide directions, including for third party complaints, information on what to expect for next steps, an overview of the investigation process, and how a complainant can follow up (*i.e.*, provide a tracking number or contact information for investigator), along with providing confirmation once the complaint is received by the Department.
- A search for "police complaint" on the Port of Seattle website should take the search directly to the complaint form page.
- Identify the location of the POSPD and substation more clearly on Sea-Tac airport maps.³³

Recommendation 31 was considered by PAIT to be of low priority. The team indicated that a subcommittee comprised of representatives from POSPD's Office of Police Accountability and the Port's Offices of Human Resources and Workplace Responsibility would be required to address the changes recommended for POSPD's complaint system. A suggestion also was made that partnership with the Port's External Relations team would help advance website changes. Finally, PAIT stated, "For security reasons, it is ill advised to place officer locations on SEA maps and signage."³⁴

The Police Department's proof of implementation for Recommendation 31 included a series of email exchanges between Commander Depolo and individuals at POSPD involved with making the changes specified in the bullet points above, including Commander Kali Matuska, Commander Kyle Yoshimura, and Senior Administrative Assistant Jennifer Robinson. POSPD also provided an updated overview map of the SeaTac terminal.

The documentation provided indicates that POSPD is implementing each of the changes specified in Recommendation 31:

- The text on POSPD's website refers to "comment or complaint," rather than using the lengthy string of terms originally included.
- For individuals filing a complaint with POSPD, language has been developed to state that the complaint has been received and that the complainant will be contacted within seven days and provided with a case number. There also is a description of the investigation process, including useful information about the different stages of an investigation, the collection of evidence, and different ways a complaint might be handled depending on its nature and severity. The overview

³³ Recommendations Report, 89.

³⁴ PAIT Review, 41. Note that the Police Department and substations were already indicated on SEA-TAC maps and identified through signage, just not very clearly.

of the complaint investigation process states, "We take all complaints seriously and are committed to conducting thorough and impartial reviews," and concludes with, "Thank you for bringing your concerns to our attention. We are committed to ensuring complaints are reviewed thoroughly, fairly, and with professionalism."³⁵ POSPD reported that using a search engine, such as Google, to learn about filing a complaint against a Police Department officer will generally take a person directly to the POSPD website page regarding complaints.

- The updated Sea-Tac terminal map provided to 21CP uses a legend with different symbols for various services available at the airport, including dining, retail, security check points, and the like. Police services are indicated with a symbol of a police officer. Some changes in signage are in progress.

In discussions with Commander Depolo about the documentation submitted as proof of implementation for Recommendation 31, he clarified that the changes must be handled by Port Information Technology ("IT"), since most involve revisions to the POSPD website. The Police Department submitted a request to IT to make the changes, but does not know when IT will incorporate the revisions in the POSPD website.

Commander Depolo also indicated that the Police Department is exploring an alternative means to improving access to the complaint filing process which could be implemented more immediately, without having to coordinate with IT to the extent required with the initial approach used. The alternative involves setting up a complaint filing system that directly interfaces with IAPro, the case management system the Police Department already uses to track complaints and use of force. This approach has the added benefit of ensuring that anyone who files a complaint anonymously can remain anonymous, while providing a means to contact the complainant to collect more information, as needed.

Satisfactory evidence was presented to 21CP that the POSPD has made changes responsive to Recommendation 31, though implementation cannot be completed without the Port's Office of Information Technology's involvement or the adoption of an approach linking the complaint filing process directly to IAPro.

³⁵ The overview includes an admonishment that making a knowingly false or misleading material statement to a public servant is a gross misdemeanor under RCW 9A.76.175.

Recommendation 32 - Diversity in Recruitment & Hiring

The Port should coordinate with the Police Department, Human Resources, and other Port components to consolidate data sources with the goal of developing a robust data collection and analytic approach to better understand the recruitment and hiring of Police department personnel, including at which stage women and/or applicants of diverse ethnic and racial backgrounds have high fail rates, and identify opportunities for improvement.

In its original discussion of Recommendation 32, 21CP noted that Port Human Resources and the Police Department provided a great deal of information on the recruitment and hiring of officers in response to requests during 21CP's assessment of POSPD. In order to generate some of the information requested, the Port Information Technology Office and external entities that provide entry-level and other law enforcement testing also became involved. Gathering material from multiple sources was time-consuming, and external testing sources do not necessarily make available all of the information needed to analyze recruitment and hiring trends. Recommendation 32 was provided in part in recognition of the importance in having recruitment and hiring data more readily available to facilitate an on-going analysis of POSPD's recruitment and hiring trends.

PAIT's review indicated that Recommendation 32 was of low priority, that a Human Resources policy review would be necessary for implementation, and that the budget could be impacted if new or additional resources and systems were needed to track recruitment and hiring data.³⁶ PAIT noted that there was a need to identify the specific types of information needed for analyzing recruitment and hiring at the POSPD and that there may be a need to modify applicant tracking systems. The group indicated that Data Analysts from the Port Business Intelligence and Human Resources might be able to assist with implementing Recommendation 32. PAIT also noted that the Port should use equity and anti-racism language in all of its recruitment and hiring materials.

As proof of implementation, POSPD provided a copy of a memorandum dated January 16, 2026, from Ericka Singh, Human Resources Talent Acquisition Manager. The memorandum indicates at the outset that the Port agrees with the intent of this recommendation and that Human Resources and POSPD have a continuing goal to improve coordination and analysis of recruitment and hiring data across multiple stages of the process, including outreach, testing, background investigations, and hiring outcomes. The memorandum notes that up until recently, due to staffing shortages, HR and the Police Department continued to focus on capturing and coordinating available data from multiple internal and external sources.

³⁶ PAIT Review, 42.

Moving towards the goal to more fully implement Recommendation 32, the Police Department converted an existing position to establish a Police Recruitment Specialist role.³⁷ The new position is intended to support POSPD's recruitment efforts, "while also assisting with ongoing data collection and coordination related to hiring outcomes."³⁸ The Police Recruitment Specialist position is expected to enhance POSPD's ability to more systematically track recruitment and hiring data, and to flag any barriers or disparities discovered at different stages of the process. 21CP learned during follow-up interviews that an individual was hired to fill the role of Police Recruitment Specialist in late March 2026 and will report to Talent Acquisition Manager Singh, with their office located in the Police Department and with a dotted line reporting relationship to the Chief of Police.

As the Port continues to coordinate and consolidate data sources relevant to analyzing Police Department recruitment and hiring patterns, the Police Recruitment Specialist will work to manually pull data demonstrating where women and ethnic/racial minorities may fall out during the recruitment and hiring process. This information can then be used to determine if it is possible to make changes at one stage or another to increase the overall number of qualified candidates moving forward for consideration. 21CP understands that the Police Recruitment Specialist is expected to be more intentional in leading POSPD's recruitment strategy, hoping to increase the number of applicants across all demographics. Port Talent Acquisition Manager Erica Singh emphasized to 21CP that developing a robust data collection and analytic approach will be ongoing and refined over time.

While it is too early for the Port and POSPD to provide data analysis along the lines contemplated by Recommendation 32, the commitment to fostering a more coordinated and productive approach is demonstrated by the creation of the Police Recruitment Specialist position. Even as the person hired to fill the role will initially need to manually cull through the data available on recruitment and hiring, their experience will help inform what systems are required to consolidate data sources and to develop a robust analytic approach.

Satisfactory evidence was presented to 21CP that POSPD and Human Resources are in the process of implementing Recommendation 32, starting with the creation of the Police Recruitment Specialist position, whose role includes manually collating recruitment and hiring data while the Port determines how to incorporate a technological approach to analyzing relevant information.

³⁷ Memorandum dated January 16, 2026, from Ericka Singh, Human Resources Talent Acquisition Manager, regarding Recommendation 32.

³⁸ Ibid.

Recommendation 33 - Diversity in Recruitment & Hiring

The Port should develop clear guidance on the benchmarks to be used in assessing the availability and utilization of persons identifying with different ethnic and racial groups, including the rationale for using census data from specific areas.

At the time of 21CP's assessment, the Port primarily relied on EEO job groupings and U.S. census data for computing utilization and availability for each job group, as required for Affirmative Action Plans ("AAPs") which were mandatory for federal contractors.³⁹ However, this approach did not facilitate a more granular approach to identifying and assessing hiring goals and other benchmarks to foster development of a diverse POSPD workforce – a concern underpinning 21CP's Recommendation 33.

During PAIT's review of Recommendation 33, the group noted that multiple perspectives for setting benchmarks must be considered (*e.g.*, to maintain CALEA certification, any benchmarking changes must be congruous with CALEA expectations). PAIT indicated that it might be necessary to sync work between OEDI, Human Resources, Employee Relations, and the POSPD in order to align benchmarking approaches used in federal, King County, and CALEA reporting requirements. The PAIT team suggested that guidance be developed that advocates for the use of King County demographic data for benchmarking purposes.⁴⁰

The Port's progress regarding Recommendation 33 was initially addressed in a memorandum to 21CP dated January 16, 2026, from Ericka Singh, Human Resources Talent Acquisition Manager. At the outset, that memorandum noted that affirmative action obligations for federal contractors were rescinded in 2025⁴¹ and that the Port no longer prepares AAPs. Nonetheless, as representatives from the Police Department and Human Resources indicated to 21CP, and as stated in Talent Acquisition Manager Singh's memorandum, the "Port remains committed to monitoring workforce demographics and identifying potential barriers to equitable representation."⁴² The Port intends to continue conducting annual demographic analyses using a barrier analysis framework, assessing representation across job categories against regional benchmarks derived from U.S. Census data. "Regional census benchmarks will be based on the relevant recruiting areas for each job classification, and the rationale for selecting specific geographic census data will be documents as part of the analysis."⁴³

Similar to the situation regarding Recommendation 32, it is too early for the Port and POSPD to provide the specific benchmarking guidance contemplated by Recommendation 33. However, Talent Acquisition

³⁹ Recommendations Report, 99. An external contractor conducted the annual data analysis necessary to support the federal AAP reporting requirements.

⁴⁰ PAIT Review, 43.

⁴¹ Ending Illegal Discrimination and Restoring Merit-Based Opportunity, U.S. President. 14173 on January 21, 2025); 90 FR 8633.

⁴² Memorandum to 21CP dated January 16, 2026, from Ericka Singh, Human Resources Talent Acquisition Manager, regarding Recommendation 33.

⁴³ *Ibid.*

Manager Singh's memorandum and interview indicate to 21CP that the Port appears to have a specific analytic approach that will be used. The Port and POSPD have expressed a commitment to providing "transparency, clarity, and consistency in how benchmarks are established and applied, while continuing to support and monitor the Port's equity-related objectives."⁴⁴

Satisfactory evidence was presented to 21CP that Human Resources is in the process of implementing Recommendation 33.

Recommendation 37 - Recruitment

Consider a variety of recruitment suggestions made by the diversity in recruitment and hiring subcommittee to gather information and to reach out to youth and other communities to garner interest in policing and in the POSPD.

21CP's Recommendations Report offered suggestions developed in the Diversity in Recruitment and Hiring Task Force Subcommittee ("DRH Subcommittee") aimed at learning more about what attracts individuals to law enforcement generally and to work as an officer at POSPD specifically, and for garnering interest among youth and other community groups. These suggestions included:

- Seek more information from current lateral hires to determine if there is a typical point in their career they sought to transfer and whether that informs how the Port approaches recruitment and hires with this demographic.
- Consider encouraging POSPD officers representing diversity in the Department spend time serving as ambassadors to minority communities, to develop relationships and interest in law enforce.
- Use internships at the POSPD to encourage youth interest in law enforcement generally and the POSPD in particular.
- Collaborate with other law enforcement agencies through Washinton to develop strategies for encouraging youth to pursue a career in policing, such as bringing together different groups of current and former Latino, African American, and female Chiefs of Police to record them talking about their backgrounds and journey into policing for televised programs to be aired in select communities. Look for financial support for the project from organizations such as the Latino Civic Alliance, which might be particularly interested if other police departments experience a low rate of applications from Hispanic/Latino like that seen at the POSPD.

⁴⁴ Ibid.

- Explore the idea of identifying "Community Ambassadors" who can work in communities to help identify people with an interest in law enforcement careers, educate them about preparation and opportunities, and facilitate connections with the POSPD, the Washington State Criminal Justice Training Commission, and similar resources.
- Explore a collaboration with police departments in other communities to partner on Community Policing Academies and Explorer Programs, reducing the time and resources necessary for a single agency to invest in these programs.⁴⁵

PAIT rated Recommendation 37 as one of medium priority and noted that implementation by POSPD had already begun at the time PAIT reviewed the recommendation. PAIT Review notes stated that Recommendation 37 is similar to Recommendation 36 ("Develop a recruitment plan aimed at increasing the number of Hispanic/Latino individuals applying to be a police officer at the POSPD") and that many actions taken regarding Recommendation 36 will advance implementation of Recommendation 37.⁴⁶ PAIT indicated that Human Resources Internship Coordinator was working actively to engage with youth.

A memorandum dated February 11, 2026, from Commander Depolo regarding 21CP Recommendation 37 addressed recruitment and hiring suggestions made by the DRH Subcommittee. Regarding the recommendation to better understand why lateral officers are interested in working with POSPD, it appears that lateral recruitment was initially driven by highly competitive pay coupled with Teamsters medical coverage after retirement, which "largely attracted officers who were in the tail end of their careers, looking to obtain their pension defining "High Five" and medical coverage after retirement."⁴⁷

Commander Depolo indicated to 21CP more recently that other agencies have caught up to or surpassed POSPD in pay, hiring bonuses, take home cars, and medical coverage post-retirement. Consequently, POSPD recruitment efforts with laterals has shifted to target officers who are earlier in their career and who are looking for a different style of policing. Recruiting is now more focused on emphasizing wellness, work schedule, and the vast number of special assignments available to new members of POSPD. Commander Depolo stated that, "This shift has been largely beneficial as most of our most recent lateral hires will still be working at POSPD 10-15 years from now."⁴⁸

POSPD's staffing crisis has impacted its ability to fully explore other recruitment suggestions made by the DRH Subcommittee, as POSPD must prioritize staffing basic patrol functions and avoid mandatory overtime.⁴⁹ By mid-2025, the Police Department had approximately 35 vacancies, including patrol officers, sergeants, and command level-leadership. POSPD has been able to reduce vacancies down to 12 officers,

⁴⁵ Recommendations Report, 102 - 103.

⁴⁶ Recommendation 36 was addressed in 21CP's Implementation Progress Report 1 (2023), 19.

⁴⁷ Memorandum dated February 2, 2026, from Commander Andrew Depolo, Office of Professional Standards and Development, regarding Recommendation 37.

⁴⁸ Ibid.

⁴⁹ Ibid.

primarily through hiring entry level officers, though has had to rely on mandatory overtime throughout the past year, with many officers working a significant number of hours during the peak travel season. The staff shortages limited many opportunities for recruitment outreach, but POSPD still attended 57 recruitment events and 10 community outreach events, including “Coffee with a Cop, Battle of the Badges, Chinatown International District Parade, as well as recruiting events at local high schools, colleges, military bases and other community events.”⁵⁰

Commander Depolo indicated that POSPD would continue to partner with Human Resources, OEDI, and local community groups to explore new recruitment activities. The job description for the newly created Police Recruiting Specialist position identifies the main responsibilities of the job, including ensuring that recruitment efforts advance Port-wide equity, diversity, and inclusion objectives; targeting outreach to attract diverse, mission-driven candidates, focusing on underrepresented communities; and tracking recruitment data to evaluate outreach effectiveness and to identify areas for improvement.

While POSPD initially developed an internal recruitment team in 2022 and 2023 to enhance recruitment generally and to develop approaches to recruit diverse candidates including Hispanic/Latino individuals (Recommendation 36) and youth and other diverse communities (Recommendation 37) more specifically, the staffing situation described above appears to have hampered recruitment efforts. Although POSPD later had a dedicated recruiter through Human Resources, the Police Department's creation of the Police Recruitment Specialist position should foster a robust recruitment approach and support advancement of Port-wide equity, diversity, and inclusion objectives, through activities such as those suggested in Recommendation 37. Even as POSPD has not necessarily considered all ideas discussed in Recommendation 37, POSPD's commitment to the intent behind Recommendation 37 is demonstrated through the creation of the Police Recruitment Specialist position. The individual hired to fill the position is encouraged to consider all of the recruitment ideas that grew out of 21CP's assessment, along with developing approaches previously not considered.

Satisfactory evidence was presented to 21CP that Recommendation 37 is being implemented, though POSPD should encourage, to the extent it has not already done so, the Police Recruitment Specialist to consider the merits of pursuing specific recruitment ideas included in the recommendation.

⁵⁰ Ibid.

Recommendation 40 - Hiring: Oral Boards

Review oral board questions to determine if they are eliciting responses that address the subject area behind each questions, such as assessing character, and consider whether the oral board should include questions directly asking applicants about involvement in extremist groups, about an encounter with someone of a different race, sexual orientation, etc., whether they have ever been the subject of discrimination themselves, or the community groups they belong to.

Although 21CP's Recommendations Report includes a note that it was beyond the capacity of the DRH Subcommittee to conduct an in-depth analysis of oral board questions, Subcommittee members concluded that a review of the questions and responses in light of the underlying values at issue in the assessment would be worthwhile.⁵¹ The Subcommittee also suggested that POSPD consider using more direct questions to explore an interviewee's biases.

Recommendation 40 was rated by PAIT as being of medium priority, noting that aspects of the recommendation were mandated by Washington State legislation and that implementation had been started by POSPD. PAIT indicated that Human Resources was reviewing social media presence to discern whether or not applicants have less than desirable ethics, social presence, affiliations as it pertains to equity, diversity, and inclusion values. Human Resources also revamped questions to get at issues raised by Recommendation 40 more directly, PAIT noted a legal review might be required.

Proof of implementation was initially provided through a memorandum from Commander Depolo summarizing the Port and POSPD's consideration of Recommendation 40, along with copies of revised oral board questions for both entry-level and lateral candidates.⁵² The entire Police Department Command Team worked with POSPD's talent acquisition representative from Human Resources who helped facilitate discussions about the oral board questions. The Command Team did not want the oral board stage to be a gatekeeper in the hiring process but, instead, to serve as a piece of the overall picture about a candidate. In a series of meetings, the group identified traits and characteristics of the ideal candidate and discussed approaches to evaluating those qualities. Emphasizing high character standards and POSPD's purpose in providing safe passage through the Port's gateways, oral board questions were rewritten to develop more tightly focused and less confusing queries.

Similar to discussions that occurred during PAIT's consideration of Recommendation 40, the Command Team discussed the idea of using specific questions about involvement in community/extremist groups, discrimination, and experience with those from another race/sexual orientation. "Both the entry and lateral boards now include questions focused on interactions or relationship building with community

⁵¹ Recommendations Report, 105.

⁵² Memorandum dated February 11, 2026, from Commander Andrew Depolo, Office of Professional Standards and Development, regarding Recommendation 40.

members from different background than the applicant."⁵³ However, questions surrounding an applicant's experience being a victim of discrimination were determined to be too subjective to score. Additionally, based on input from a representative of the Port Commission Office, the definition of "extremist group" was determined to potentially vary too widely to be asked about in the oral board context. POSPD concluded that applicant background checks should be sufficient for discovery of involvement in such groups.

The revised questions generally appeared on their face to be designed to elicit relevant information, as contemplated by Recommendation 40, and have been tested in actual oral board settings. In a follow-up meeting with Commander Depolo, he indicated that the revised oral board questions for lateral applicants required more fine tuning, though questions for entry-level candidates seemed to be working well.

Satisfactory evidence was presented to 21CP that Recommendation 40 has been implemented.

Recommendation 43 - Hiring Process - Generally

While points can be added to an applicant's score if they speak a second language, consider a pay incentive or hiring preference for the ability to speak more than one language, encouraging multilingualism for applicants and current employees.

Given the diverse languages spoken by Port stakeholders, including travelers from around the world, having officers who can speak more than one language allows the Port to be able to respond to customer needs. The intent behind Recommendation 43 was to encourage multilingualism within the Police Department given the diversity of languages officers might encounter while providing police services.

When PAIT reviewed this recommendation, it was rated as being of medium priority. PAIT noted that the Port's Labor Relations would need to be involved with any negotiations and contractual changes required to implement the recommendation. PAIT Review notes also indicated that Human Resources and the Police Department would need to make job description changes to identify multilingualism as a preferred qualification. PAIT suggested that an alternative approach would be to give additional weight at the oral board stage to applicants who speak multiple languages. In addition, PAIT recommended that extra points be added to an applicant's score for community service, though did not provide further explanation.

The Port and POSPD considered Recommendation 43, though ultimately did not pursue implementation. POSPD provided 21CP with a memorandum dated January 7, 2026, from Commander Depolo, summarizing the Port's reasoning, along with an email explanation from Milton Ellis, Assistant Director of Labor Relations. According to the information provided, the Port considered developing a policy that would provide a pay premium for multilingual employees throughout the Port, with Human Resources

⁵³ Ibid.

determining whether a person would qualify for a premium. However, Human Resources ultimately determined it would not be developing a multilingual policy.

In meetings held in Q3 2025, to discuss the multilingualism premium, Human Resources expressed concern regarding implications for Civil Service rules and Police Department representatives voiced concerns about language verification slowing down the hiring process for officers in today's very competitive market. However, Commander Depolo's January 7, 2026, memorandum stated that the process has changed, such that all candidates receiving a passing score undergo a background review and are processed based on the timeliness of the candidate's background packet submission. Consequently, if the Port did develop a policy providing for a pay incentive or hiring preference for candidates who can speak more than one language, it would not impact POSPD's hiring process, as all candidates with passing scores move to the backgrounding stage.

Human Resources noted that pay for multilingual capability would be in support of the Language Access program which is led by OEDI. The Language Access program allows the Port to equip most employees who have passenger-facing roles with resources to assist non-English-speaking customers. Assistant Director of Labor Relations Ellis noted that "very few jobs" require that the incumbent be certified with multilanguage skills, such that the compensation component would not be broadly applied.⁵⁴ He also referred to a decision by Human Resources indicating until speaking multiple languages to assist customers becomes an essential task in a job's requirements, the Port will not apply a premium.⁵⁵

POSPD Dispatchers and Traffic Support Specialists bargaining groups expressed interest in the multilingualism benefit and the Port agreed to include a reopener in those respective contracts, with the understanding that any compensation associated with the benefit would derive from a Port policy.⁵⁶

Satisfactory evidence was presented to 21CP that Recommendation 43 was considered and that the Office of Human Resources determined that implementation was unnecessary given the few positions requiring multilanguage skills and the availability of translation services.

Recommendation 48 - Leadership Selection & Development

The POSPD should continue to utilize national and local leadership development opportunities, but with transparent selection criteria.

During 21CP's assessment of the POSPD, some officers expressed concern about the fairness of the selection process for leadership development programs. At the time, the Police Department had no

⁵⁴ Email communication dated January 7, 2026, from Milton Ellis, Assistant Director of Labor Relations, to Commander Depolo, regarding Recommendation 43.

⁵⁵ Ibid.

⁵⁶ Ibid.

established internal selection criteria, the selection process was not transparent, and sometimes the training experience was wasted on officers close to retirement, with POSPD possibly not receiving much benefit from such officers' leadership training.⁵⁷ As noted in the Implementation Progress Report 3 (2025) regarding special teams assignments, developing a process to ensure greater transparency and communication regarding the selection of officers for leadership development can help facilitate a sense of fairness and internal procedural justice within the Police Department.⁵⁸

PAIT Review notes indicated that Recommendation 48 was of medium priority. With respect to budgetary implications, the group suggested that POSPD consider designating "additional dollars to create more opportunities for Officer programming that promotes leadership skills and career development opportunities."⁵⁹ PAIT observed that most officers selected for leadership training had researched available options themselves and suggested better documentation of selection criteria and more communication about available opportunities.

A memorandum regarding Recommendation 48, dated January 13, 2026, from POSPD Deputy Chief Alycia McKinney, Patrol Bureau, was provided as proof of implementation. 21CP also met with Deputy Chief McKinney to discuss questions about the information she provided. The memorandum stated that the Department had made "significant and intentional investments in leadership development at all supervisory and command levels."⁶⁰ Factors that guided POSPD's review and enhancement of its leadership development program included, "clarity of expectations, consistency in training, accessibility to development opportunities, and alignment with the Department's Purpose, Values, and Goals."⁶¹

Deputy Chief McKinney's memorandum outlined nine initiatives undertaken by the Department in the preceding year to enhance leadership development:

- Leadership Expectations Framework - To ensure "transparency, consistency, and accountability in how leadership behaviors are defined, evaluated, and reinforced,"⁶² POSPD developed a list of "Leadership Expectations" that are also used as a framework for commendations, coaching, mentoring, and discipline. The memorandum notes that POSPD's Leadership Expectations align with the Police Department's stated purpose, values, and goals. The Leadership Expectations list includes the following principles:
 - Leadership
 - Team Development
 - Effective Communication
 - Problem-Solving

⁵⁷ Recommendations Report, 117.

⁵⁸ Implementation Progress Report 3 (2025), 18.

⁵⁹ PAIT Review, 58.

⁶⁰ Memorandum dated January 13, 2026, from Deputy Chief Alycia McKinney, Patrol Bureau, regarding Recommendation No. 48, 1.

⁶¹ Ibid.

⁶² Ibid.

- Supportive Environment
- Recognition
- Invest Time
- Integrity
 - Mission Commitment
 - Ethical Conduct
 - Impartial Leadership
- Accountability
 - Set the Standard
 - Performance Awareness
 - Transparent Decision Making

The one-page document listing Leadership Expectations includes definitions for each principle, with some including examples. A copy of the document is provided to each new officer joining the POSPD, is posted throughout the Police Department, and is referenced during training and otherwise. Further, each new POSPD hire meets with Command staff, to address an agenda that includes review of the purpose and values behind the Leadership Expectations.

- **Revised New Sergeant Training Program** - To supplement and improve upon supervisory training required by Washington State law through the Criminal Justice Training Center ("CJTC"), the Department redesigned its internal New Sergeant Training Program, "to strengthen leadership preparation and ensure consistent standards for new supervisors."⁶³ The revised program includes four days of classroom-based instruction⁶⁴ and nine-weeks of on-the-job training. New sergeants receive formal feedback at the end of this training and every three months afterward until the end of their nine-month probation period.
- **First Level Supervision (CJTC)** - POSPD sends new sergeants to CJTC's first-level supervisory training, in compliance with Washington State's requirement that all law enforcement personnel promoted, transferred, or hired into a supervisory or management position complete the core training requirements prescribed by CJTC.⁶⁵
- **Two-Day 11C Sergeant Leadership Workshop** - POSPD implemented a mandatory two-day workshop for all sergeants that focuses on mission critical teams, emotional intelligence, growth mindset, feedback and high-stakes conversions, wellness, and coaching and mentoring. Continuous professional growth is supported through individual, ongoing mentoring sessions for each sergeant to reinforce classroom learning.

⁶³ Ibid.

⁶⁴ Even if they have not been promoted, the four-day classroom training is available to other officers, increasing overall transparency and providing early access to leadership development for those interested.

⁶⁵ RCW 43.101.350; WAC 139-25-110.

- **PTO Leadership Training** - All Police Training Officers (PTOs) must complete a two-day advanced leadership course focused on leading and coaching, with key areas of instruction including reframing the role of the PTO, mentoring a multi-generational workforce, coaching techniques, reaching across personality types, developing high-performing teams, integration into agency culture, and principle-based training and values-based leadership.⁶⁶
- **Table Group Leadership Retreat** - Operations Bureau Sergeants, Commanders, and the Deputy Chief and Chief met in a one-day retreat facilitated by Patrick Lencioni's *Table Group*⁶⁷ to develop alignment on a roadmap for leadership decision-making.
- **Paul Butler Leadership Presentation** - Paul Butler, with 27 years of law enforcement experience, including as a Chief and Deputy Chief, gave a presentation to POSPD focused on "leadership, motivation, customer service, and attitude empowerment."⁶⁸
- **Gravity Leadership Series** - POSPD Commanders, Sergeants, and the Deputy Chief participated in a series of three-hour workshop sessions focused on decision-making, crucial conversations, and conflict management within teams.
- **External Leadership Development Opportunities** - POSPD encourages and supports participation in leadership development opportunities such as LEEDA, Build Your Leadership Toolbox, TEEX Enhanced Incident Command/Unified Command, TED Talks, and through professional leadership literature (*e.g.*, Sergeants and Commanders receive copies of the leadership books *The Advantage* and *The Ideal Team Player*).

Most of the leadership opportunities described above are required or made available to all officers within a certain cohort (*i.e.*, Sergeants and/or Commanders), which should allay concerns about the fairness of the selection process. Further, it appears that POSPD is using a cohesive approach to leadership development, tying leadership expectations into leadership training and advancement across the Police Department. Deputy Chief McKinney's memorandum concluded by noting, "These efforts align with national best practices, provide clear pathways for leadership growth, and [respond to Recommendation 48] by ensuring leadership development opportunities are intentional, inclusive, and grounded in organizational values."⁶⁹

Satisfactory evidence was presented to 21CP that Recommendation 48 has been implemented.

⁶⁶ Ibid., 2.

⁶⁷ Table Group, <https://www.tablegroup.com/?srsltid=AfmBOop7hpPRgRGG4HCeevQ6sEt2hb0HVom9bGjyFAWh5OClIrPGwUc8> (last visited Apr. 28, 2026).

⁶⁸ Ibid., 3.

⁶⁹ Ibid., 4.

Recommendation 51 - Engagement re: Legislation

The Port should continue to engage with key stakeholders and elected officials on emerging state and federal legislation.

21CP concluded its assessment of POSPD during a time when the Police Department and other law enforcement agencies in Washington State were considering significant changes impacting policing enacted during the 2021 legislative session. As noted in 21CP's Recommendations Report, some proposed reform approaches did not make it into law during that session, and more changes were likely to be introduced in the future. 21CP commended POSPD's regional leadership role in advancing policies related to the 2021 legislation and, through Recommendation 51, the Police Department was encouraged to continue to take a proactive role, along with the Port, to help shape evidence-based law and policy related to policing.

Recommendation 51 was deemed to be of medium priority during the PAIT review process. In considering the recommendation, the PAIT team observed that input from the Port's External Relations teams regarding existing efforts for coordination by federal, state, and local Government Affairs staff would be necessary.

The Police Department provided a memorandum from Deputy Chief Sean Gillebo (now Interim Chief) dated January 7, 2026, documenting specific activities taken by the Port to monitor developments, assess impacts, and share "the Port's unique operational and community-focused perspectives with policymakers."⁷⁰ POSPD also provided copies of email exchanges between Deputy Chief Gillebo (now Interim Chief), Eric Schinfeld, Sr. Manager, Federal & International Government Relations and John Flanagan, Sr. State Government Relations Manager, regarding their continual tracking of any state and federal legislation involving police services. Information in the email exchanges appear to have informed the memorandum by Interim Chief Gillebo.

Per POSPD's offer of proof, there are three recent issues the POSPD and Port have monitored:

- Implementation of Washington State's updated civil asset forfeiture statute,⁷¹ along with engagement in a statewide coalition of sheriffs and police chiefs tracking the statute's outcomes and any implementation concerns.
- Supplementation of proposed updates to public defender caseload limits, acknowledging the intersection between caseloads, due process, and justice system reforms

⁷⁰ Memorandum dated January 7, 2026, from Deputy Chief Sean Gillebo, regarding Recommendation 51.

⁷¹ Washington State civil asset forfeiture allows for the seizure of cash, vehicles, and property if shown by a "preponderance of the evidence" as being connected to a crime. The majority of proceeds resulting from civil asset forfeitures go to law enforcement. Effective January 1, 2026, the burden of proof was raised to "clear, cogent, and convincing evidence." RCW 10.105.010.

- Developing a strategy with the Washington State Department of Transportation and the Washington State Patrol regarding law enforcement efforts on the airport expressway subject to state-control, with a focus on police practices and jurisdictional roles.

In conclusion, the memorandum states, "[T]he Port will continue to evaluate proposed reforms, determine, their relevance to Port operations and communities, and engage with elected officials and stakeholders to help shape policies that advance accountability, equity, and public trust while supporting the Port's mission and workforce."⁷²

Satisfactory evidence was presented to 21CP that Recommendation 51 has been implemented.

CONCLUSION

This report documents continuing progress in reviewing and implementing improvement recommendations resulting from 21CP's assessment of the Police Department. 21CP made a total of 52 recommendations in September 2021, with POSPD selecting a subset to implement each year over a four-year period. During the first three years that 21CP was asked to monitor the implementation process (2023 through 2025), 39 recommendations were determined to be implemented, with one recommendation withdrawn as no longer applicable. During the 2026 reporting period, the remaining 12 recommendations were considered for implementation.

Many of the 12 recommendations discussed in this report required collaboration with other Port components, such as Human Resources. Other recommendations were directed to a Port component other than the Police Department. Regardless of where the ultimate responsibility for implementation might rest, representatives from throughout the Port readily contributed to the review and discussion about the merits and process of implementation. 21CP observed and benefitted from the input offered during Review Committee meetings and in interviews with numerous subject matter experts.

This Implementation Progress Report 4 (2026) addresses implementation efforts regarding 21CP's final 12 recommendations. Satisfactory evidence of implementation was provided regarding four recommendations and the POSPD or another Port component considered but rejected another four recommendations. Regarding the final four recommendations reviewed, 21CP determined that good progress on implementation was being made, but that more time or resources were needed, or POSPD was dependent on another Port component, before implementation could be fully realized.

As it has done previously regarding implementation of 21CP's recommendations and in accordance with the goal of ensuring transparency and accountability, POSPD should provide updates in its annual report to the Port Commission on the status of implementation for the remaining four recommendations. In

⁷² Memorandum dated January 7, 2026, from Deputy Chief Sean Gillebo, regarding Recommendation 51.

addition, consideration should be given to including implementation of the final four recommendations in POSPD's EDI goals. The Police Department appears relatively close to resolving concerns underlying 21CP's Recommendation 31. The POSPD has made substantive changes with its complaint filing system and has identified alternative approaches for improving access to the system. Recommendations 32, 33, and 37, all address aspects of robust officer recruitment and hiring data analysis, which is important to furthering the Port's equity-related goals. The POSPD and Human Resources have developed a collaborative, productive partnership, have been actively working together to address issues underlying these recommendations, and should continue to coordinate in providing information to the Port Commission on implementation progress. The recently on-boarded Police Recruitment Specialist is working to streamline data collection and pursue other means to enhance police recruitment and hiring data analysis. Having personnel dedicated to better understanding and improving the POSPD recruitment and hiring process and related analytics should allow the Police Department and Human Resources to move expeditiously in fully implementing the remaining 21CP recommendations.

Ensuring accountability and transparency regarding these final implementation steps serves the important work of the Task Force on Port Policing and Civil Rights and the contributions made by many internal and external stakeholders since 2020. 21CP is honored to have had the opportunity to support the Port of Seattle and POSPD in this important endeavor – and to see sustained, tangible evidence that the Port and Police Department have implemented meaningful changes across a host of dimensions to ensure safe, effective, and fair public safety services.
