

February 24, 2022

Elizabeth Pauli  
City Manager  
City of Tacoma  
747 Market Street  
Tacoma, WA 9840

Dear City Manager Pauli:

Last September, 21CP Solutions entered into a services contract with the City of Tacoma to coordinate the oversight of implementation of all community safety related transformational initiatives, including the recommendations issued by 21CP and Matrix Consulting. A second phase was contemplated in which 21CP would help develop and implement a Community Safety Office.

During our weekly discussions as this project moved forward, we prioritized implementation of the Alternative Response Models recommended by Matrix – specifically diversion of mental health crisis calls and non-emergency calls to civilian responders. At the same time, 21CP engaged with the Tacoma Police Department to track policy implementation and transformation efforts in the other areas. This memo summarizes the lessons learned from this engagement.

## **Engagement**

For the past few months, 21CP has engaged with a wide variety of City of Tacoma stakeholders to better understand the lay of the land and available resources, including: Tacoma Police Department, Tacoma Fire Department, Neighborhood & Community Services, Office of Equity & Human Rights, Media & Communications, Continuous Improvement, Information Technology, South Sound 911, MultiCare Behavioral Health, and explored alternative response options with the City of Albuquerque.

There is a lot of energy, skill, and experience in these departments and stakeholders and offers of support came frequently during these discussions. Ultimately, however, TPD has not been in a position to make full use of the resources available throughout the City, which, as discussed below, is not due to lack of commitment or otherwise the fault of the department. Rather, the lack of capacity to capitalize on available support to accelerate the evaluation and implementation of

recommendations is due to the volume of recommendation and significant resource issues including staff vacancy levels, leadership transitions and long-standing gaps in administrative structures.

### **Tacoma Police Department**

TPD was very responsive to our efforts and welcoming, as was every city employee we engaged with. There were several members of Chief Ake's staff that are clearly trying to drive transformation with the help of Continuous Improvement (CI). CI developed a sophisticated visualization of the changes mandated by state law, local law, and the recommendations from 21CP and Matrix. Simply put, the magnitude of these changes is overwhelming.

This magnitude of change is coming at a time when TPD is undergoing a major transition with the arrival of a new Chief and the need to replace several other positions within Command Staff. At the same time, the department is experiencing high levels of vacancy while responding to increased levels of crime and calls for service. With these factors, the department is not well positioned to drive such monumental change. Similarly, the administrative structures within the department to support transformation are underdeveloped. The 21CP recommendation to hire a Chief Operating Officer to drive strategic change should be prioritized, so that the incoming Chief has the necessary professional support. Under the COO, strong administrative and project management structures should be created – the department needs a team of “doers” to move the department forward. As set forth in the original 21CP report:

They often face challenges related to budgets, human resources, technology, and general management. Many activities of a police organization, although supporting the overall mission of the agency, are not directly related to law enforcement but, instead, are focused on managing and administering a large organization that performs a variety of disparate functions. Consequently, many positions in a police department do not require a police commission, and many benefit strongly from traditionally civilian skill sets with expertise in organizational management. Individuals with management backgrounds in other settings can bring additional skills, fresh perspectives, and new ideas in a way that can energize and enrich police organizations.<sup>1</sup>

The lack of capacity frustrated work over the last several months. This is offered as an observation, not a criticism, because it is not the fault of the department that it does not have the structures needed to complete work not typically undertaken by police departments. CI is certainly capable of supporting change, but the department needs to be able to resource and lead the effort to ensure business needs are met and to own its vision for the future.

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<sup>1</sup> 21CP Solutions, Recommendations for the Tacoma Police Department, Recommendation No. 38 at 103.

## Mental Health Calls

Specifically, for mental health calls Matrix recommends a co-responder model that incorporates a crisis intervention worker or clinician, a civilian responder similar to the Community Service Officer model discussed below, and an EMT trained responder.<sup>2</sup> The overlaps in these roles may not require three separate people as long as the functions were covered.<sup>3</sup>

However, Matrix noted that based on data from similar mental health alternative response models, such as CAHOOTS in Eugene, Oregon, “diverting these types of calls to civilian response does not entirely remove the need for police presence at these events.”<sup>4</sup> Matrix estimated that 23% of calls among possible call types could be diverted to civilian mental health crisis response.<sup>5</sup>

Matrix cautioned that:

In an alternative model where the team is organized outside of the police department, there may be greater challenges in filling the positions. The perception and reality of safety issues posed by responding to individuals experiencing mental health crisis would likely be of concern to many clinicians that consider applying to the role, particularly if they are not paired up with an officer.<sup>6</sup>

Pierce County has authorized MultiCare Behavioral Health to be the provider responsible for training and hiring Designated Crisis Responders (DCRs), who have the ability to recommend involuntary commitment under the Involuntary Treatment Act (ITA). TPD has a contract with MultiCare to supply DCRs for the current police-DCR co-responder program, but at present only provides one DCR. 21CP approached MultiCare to see assess two options for mental health call response. First, how quickly the current program could be scaled up to meet the high level of need for this service while other options are explored and implemented, and second, what options are available in our region for a different co-responder model or alternative response.

As to the stop-gap proposal of hiring additional DCRs to support Tacoma’ current model, we learned that this would be very difficult and we were told that perhaps one additional DCR could be provided in 2022. As to an alternate response model, we were advised that there was almost no

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<sup>2</sup> *Tacoma Alternative Response Report*, Matrix Consulting Group (May 21, 2021) at 27.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.* at 25.

<sup>5</sup> 21CP did not conduct a service analysis on the data or estimate of how many calls could be diverted, but notes that an analysis of similar models in Denver found possible diversion of 2.8% of the total 911 call load ([https://wp-denverite.s3.amazonaws.com/wp-content/uploads/sites/4/2021/02/STAR\\_Pilot\\_6\\_Month\\_Evaluation\\_FINAL-REPORT.pdf](https://wp-denverite.s3.amazonaws.com/wp-content/uploads/sites/4/2021/02/STAR_Pilot_6_Month_Evaluation_FINAL-REPORT.pdf)) and an analysis of the CAHOOTS program found potential diversion rates of 5-8% for calls that police normally respond to, but importantly identified that the program was not only responding to traditional police calls, but actually filling a previously unfulfilled area of service (<https://www.eugene-or.gov/DocumentCenter/View/56717/CAHOOTS-Program-Analysis>).

<sup>6</sup> *Alternative Response Report* at 26.

possibility that a DCR would be willing to deploy without police support in the current context. This confirms what Matrix cautioned and suggests that Tacoma may not be able, at this time, to implement an alternate response model with DCR support that does not include police support. A revised approach may be an expansion of the co-responder model with police, but deemphasizing police as primary on such calls. However, as mentioned above, this option will be impacted by the overall limitations on availability of DCRs.

Some jurisdictions opt for the “one size doesn’t fit all” approach and provide a suite of services intended to provide the most support for the most people. This year, the City of Albuquerque’s Community Safety Department launched a multi-tiered response that includes a co-responder model (mobile crisis response with clinicians and police), Behavioral Health Responders who “respond in person or by phone to requests for assistance with individuals experiencing issues with mental and behavioral health, inebriation, homelessness, addiction, chronic mental illness as well as other issues;” Community Responders who “respond to minor injuries or incapacitation, abandoned vehicles, non-injury accidents, needle pickups, or other calls for service in the community,” and a Street Outreach and Resource Coordination Team to respond to and coordinate services for persons experiencing homelessness.<sup>7</sup> Albuquerque chose not to contract these services, but instead created a new department of Community Safety and directly hired employees to do this work. Initially 56 staff were hired at a cost of \$7.5M, but the City intends to scale this project to 200 staff by end of 2022.<sup>8</sup>

While it is not necessary that all crisis responders have the ability to recommend involuntary commitment under the ITA, 21CP was unable to identify the availability of any resources to fulfill the role of civilian mental health response. Therefore, while the move to alternative mental health response should be done with a bias for action, the City should issue an RFP to identify a provider or providers that can supply resources for mental health response.

It is worth noting, however, that traditional RFP processes can disadvantage the very community organizations that should be responding to this inquiry – those that provide community-based, culturally competent resources, but may not be structured with the administrative systems to jump through City bureaucratic requirements. As such, while moving forward, the City should prioritize outreach to culturally competent organizations and facilitate the RFP process to ensure access to the process. Priority should be given to Minority or Women Owned Businesses or organizations with experience with BIPOC communities and the City should build such experience into the requirements of the RFP itself.

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<sup>7</sup> <https://www.cabq.gov/acs/our-response>

<sup>8</sup> 10/28/21 interview with Joshua Reeves.

### **South Sound 911 Integration**

21CP met twice with representatives of South Sound 911, including Executive Director Deborah Grady, to discuss call handling for alternative response models. At the outset, South Sound 911 (SS911) expressed a strong interest in housing a mental health provider at the call-center and was open to a pilot with the City of Tacoma. This would allow calls to be diverted to a mental health resource immediately, which for some calls could completely obviate the need to ever dispatch first responders of any kind by directly connecting callers with services.

Importantly, South Sound 911 is a regional 911 dispatch center that serves 19 law enforcement agencies, including Tacoma, and 17 fire service agencies. The Tacoma Fire Department operates its own communications center (and coordinates service to surrounding cities such as Fife, Fircrest, and Ruston). As South Sound 911 is not city-operated, there is some loss of control over operations. Additionally, TPD uses the records management system (RMS) provided by South Sound 911 for data entry and records management. While this helps provide integration between the Computer Aided Dispatch (CAD) system and the RMS, it does potentially limit the data fields available to TPD to gather additional and more robust data. For example, the current co-responder model is not integrated into CAD and South Sound 911 does not have data on TPD's current co-responder model, in which a mental health provider is dispatched with an officer. This is not necessarily due to any system limitations and could simply be because those resources were never added to the system.

South Sound 911 has agency specific protocols, which they already employ to connect callers to appropriate resources. For example, for the City of Tacoma, South Sound 911 routs categories of calls, such as noise complaints, to the 311 system rather than deploying an officer or other first responder. As such, South Sound 911 indicated that they have the capacity to connect to other resources and implementation of CSO dispatching would "not be a stretch."

South Sound 911 indicated that a CAD/RMS replacement was on their roadmap and as Tacoma develops its alternative response model, responses to persons in crisis, and upgrades the stops and detentions, use of force, and other officer activity reporting requirements, the City should work with South Sound 911 to ensure that the developing systems can accommodate Tacoma's needs. South Sound 911 expressed a willingness to collaborate and acknowledged that other jurisdictions are considering alternative or multi-disciplinary response options.

### **Crisis Intervention Committee**

During our discussions, we considered whether a Crisis Intervention Committee could help identify resources for mental health response in Tacoma. Several jurisdictions have benefited from the creation of a multi-disciplinary and interagency advisory committee composed of regional mental and behavioral health experts, social service providers, clinicians, community advocates,

academics, other law enforcement agencies, the judiciary, and other stakeholders in the mental health/crisis areas, to coordinate efforts to address these regional issues.<sup>9</sup>

As set forth in the Seattle Police Manual:

The purpose of the CIC is to build an effective regional crisis incident response built upon best practices, innovation and experience. The CIC works in cooperation with the Department to make sure that crisis intervention training and policies are consistent with legal standards, best practices and community expectations. The intent is to include representatives of entities that can assist the Department in achieving the purpose of the CIC. These entities will come from several categories: city and county government (including law enforcement agencies and line patrol officers), mental health professionals and advocates, academia, and others deemed appropriate.<sup>10</sup>

A caution here – this committee should include those who best understand the detailed working of social support systems and are in the best position to inform processes based on what will work in practice. While there should always be room for vision, this committee must be practical and not solely ideological.

Also, the committee does not need to be led or sponsored by the police department – in fact, many community perspectives would reject that idea – but it does need to *include* the police department. But this concept could be advanced at the City level. This is designed as a group to work collaboratively with the police department, fire department and other informed stakeholders to design the most effective crisis response plan and then to continually refine that approach.

Primary responsibilities of this committee should be:

- Work with the City to design and maintain the spectrum of response options for persons in crisis
- Develop and maintain a resource map of available options to refer individuals in crisis
- Enhance community connections with advocates and social service professionals, as well as provide for a seamless system of care for persons in crisis
- Review and validate the Department’s CIT training

While this concept runs the risk of simply adding one more task to an already overwhelmed transformation structure, it can also provide the foundation to identify and include resources that

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<sup>9</sup> <https://www.adamhsc.org/about-us/current-initiatives/task-forces-and-coalitions/mental-health-response-advisory-committee-mhrac>;

<sup>10</sup> <https://www.seattle.gov/police-manual/title-16---patrol-operations/16110---crisis-intervention>

can help the development of many of the other recommendations, including many in the Matrix Alternative Response Report.

### **Community Service Officers**

Matrix recommended creation of a Community Service Officer program of 11 employees, predicting that 12.3% of calls for service could be diverted from sworn officers.<sup>11</sup> As discussed previously, 21CP anticipates that the overall diversion would be lower, but that previously unserved needs would be addressed. This would greatly help Tacoma, for example alleviating the reported need to close library bathrooms due to the daily accumulation of needles. Needle pick-up and disposal could easily be completed by CSOs.

Implementation of this recommendation is not solely dependent on the police department resources and is underway with efforts around planning, class comparisons, bargaining with affected unions, budgeting, etc. Ultimately, as a deployable resource, the CSOs should be sourced in the police department, which will make technological and logistical integration much more feasible. For example, sharing of criminal justice information is far more feasible intra-department. This continuity will help operations, as noted by Matrix:

CSOs would still be operationally interacting with police officers across virtually every facet of their job – Radio traffic, such as when triaging response – Handling or coordinating the handling of evidence – Using the same CAD/RMS system – Calling for backup should it be needed.<sup>12</sup>

Attached to this memo is a proposed job description for this class of employee.

### **Policy Development**

TPD has outsourced the policy recommendations made by 21CP, as well as state mandated legal changes, to Lexipol. Lexipol is a private subscription company that provides “a full library of customizable, state-specific law enforcement policies that are updated in response to new state and federal laws and court decisions.” The advantage to such a service is regular updates based on changing laws at the state and federal level, which can help jurisdictions that lack internal policy development resources to keep current on policy. This service, combined with CALEA (TPD is accredited) undoubtedly focuses the department on developing and maintaining policies. Additionally, when other regional agencies subscribe to the service, as is the case here, mutual aid engagements and cooperation between agencies are improved due to the common operational policies.

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<sup>11</sup> Alternative Response Report at 44.

<sup>12</sup> *Id.* at 45.

This resource should be used with caution. Even though Lexipol purports to provide policies that accord with best practices, there has been developing scholarship identifying Lexipol as “a barrier to reform.” Lexipol did not update its model Use of Force policy to include the concept of de-escalation until 2020, which highlights the need for TPD to continue to be accountable for ensuring that all policies adopted by the department reflect modern policing practices. As such, Lexipol is a good choice to overcome the lack of administrative capacity to overhaul the policy manual, but sophisticated review needs to be incorporated to ensure that the policies accord with best practices and are not just the bare legal minimum. This requires coordination with TPD’s legal advisor and redesign of the position currently responsible for developing policies. During this engagement, this Sergeant position became vacant and members of TPD proposed civilianizing that position. That is an excellent idea and adding a sophisticated civilian policy analyst to work with and adapt Lexipol policies will greatly help the department get this right.

21CP Solutions, LLC