



# CITY OF PORTLAND, OREGON



## Bureau of Police

Keith Wilson, Mayor  
Robert Day, Chief of Police

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January 23, 2025

Dear PCCEP Members:

Thank you for your November 25, 2024 recommendation related to additional Veil of Darkness analysis and PPB’s Annual Stops Data Report. I know there was substantial work put into the recommendation by PCCEP’s volunteer members, and I want to express my appreciation for that effort. I have consulted with my team to review and consider the recommendation.

As PCCEP is aware, paragraph 148 of the Settlement Agreement requires analysis of demographic data related to police stops. Paragraph 148 has been in substantial compliance since the DOJ’s Fourth Compliance Assessment, which covered 8/30/2017-4/11/19. That report was filed on 5/4/2019. Based on this history of compliance, paragraph 148 moved to self-monitoring in 2024. Because of the current availability of the Veil of Darkness (VOD) analysis from the State of Oregon, the findings of no disparities in the decision to stop by PPB in all prior State analysis, and the workload associated with the recommendation, PPB will not be adding a second Veil of Darkness analysis to its Annual Stops Data Report.

To improve the Bureau’s and the public’s understanding about whether PPB stops are equitably distributed among racial groups, PCCEP recommends incorporating Veil of Darkness analysis in the annual stops report. The Portland Police Bureau agrees with the statistical validity and usefulness of the VOD analysis to describe the demographic makeup of stops performed by the agency. However, VOD analysis of PPB stops data is already completed by the State of Oregon Criminal Justice Commission and publicly available (<https://www.oregon.gov/cjc/stop/pages/default.aspx>) on an annual basis. There are currently six years of analysis available, starting with Fiscal Year 2019. Over that time period, the VOD analysis has not identified evidence of racial/ethnic disparities in the decision to stop (see table below).

### Veil of Darkness Analysis Results for State of Oregon Annual S.T.O.P. Statistical Transparency of Policing Reports

Report Year	Asian	Black	Hispanic/ Latinx	Middle Eastern	Combined	Findings
2019		0.86	0.77		.83*	No Disparity
2020		0.99	1.09			No Disparity
2021	0.80	0.94	1.10	0.96		No Disparity
2022	1.08	0.99	1.17	0.90		No Disparity
2023	0.90	1.06	1.32	1.11		No Disparity
2024	1.23	1.07	1.12	1.12		No Disparity

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*enhance their understanding of racial disparities in stops.”* Findings from the prior six annual reports have found no disparities in the PPB’s decision to stop. The VOD analysis has not identified a disparity that PPB’s current benchmarking method failed to highlight. Additionally, the results from the State analysis are already available to be used by PPB, PCCEP, and other collaborators to inform the development of actionable strategies for improving equitable policing practices. Those discussions do not need to be limited to the findings of the PPB annual report.

PCCEP’s recommendation states expected outcomes including that *“By understanding the factors that contribute to unequal stop patterns if any should emerge, the PPB can better tailor its training and policy initiatives to promote fair and just policing practices.”* However, the current PPB stops data benchmark and the VOD analysis do not identify the factors that contribute to unequal stops patterns (if they emerge). Instead, these analysis methods can only identify the patterns, not the contributing factors.<sup>1</sup> The analysis should be used to identify disparities, additional exploration of information outside of stops data collection and analysis would be required for identification of the factors.

PCCEP recommends the CJC’s VOD analysis be integrated into all future reports, as well as an analysis of prior years (2001-2023) in order to establish and evaluate trends. The State of Oregon analysis covers six years of data and can be used by PCCEP to evaluate trends. The process to collect the stops data, complete the current analysis processes, and draft the annual report is labor intensive and this additional historical analysis would require resources beyond the Bureau’s capability, particularly in light of the City’s current budget forecasting. Further, not all stops records are digitized or contain date/time of the stop which would be required for the analysis and, again, would require significant additional resources to digitize. The annual reports for prior years are available on the website and the current annual reports include analysis of trends for the past few years.

PCCEP also recommends that *“Similar to the State Criminal Justice Commission Report, PCCEP requests that the VOD data be presented in table form as a logistic regression of minority status on daylight. The table should have a clear explanation about what constitutes evidence of a racial disparity in stops.”* The recommendation appears to duplicate the analysis and report format of the State. While PPB supports that format for this data, the State’s report should be leveraged, rather than duplicated by PPB.

PCCEP has additionally recommend the results of the stops analysis be shared publicly. The PPB agrees and has always shared the analysis results with the public. The reports are available on the PPB website (<https://www.portland.gov/police/open-data/stops-data>) and will continue to be going forward. To ensure the community is aware of and can easily access the CJC’s VOD analysis, PPB will be happy to include a link to the report on their stops webpage.

Finally, PCCEP recommends that PPB collaborate with community members, advocacy groups, and academic experts to interpret the analysis’s results and develop actionable strategies for improving equitable policing practices. The Annual Stops Reports should be used to inform these discussions. The

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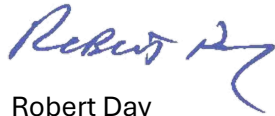
<sup>1</sup> See Fridell, L.A. (2005). *Understanding race data from vehicle stops: A stakeholder’s guide*. Washington, DC: Police Executive Research Forum.

Chapter 2 from that report is most relevant as it talks about the multiple factors that are involved in an individual’s “risk” of being stopped, including but not limited to: driving behavior, driving quantity, location, and race/ethnicity of the driver. The stops data collection only deals with who is being stopped (race/ethnicity) and does not deal with these outside factors and others that are unknown to us.

PPB Annual Stops report is deliberately designed to act as a discussion starting point for internal and external stakeholders of the Portland Police Bureau. The PPB encourages collaborators to use the Annual Stops report and the State reports to inform discussion to develop actionable strategies for improving equitable policing practices beyond the scope of data collection and analysis techniques.

PPB is happy to engage and support these discussions and collaborations with community to gain better insight and understanding of PPB's data. PCCEP is uniquely situated to help bring these conversations forward, which I greatly appreciate. I will work with PCCEP's staff to coordinate how PPB and I can be available to answer questions and continue to work with you in partnership.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Day", with a stylized flourish at the end.

Robert Day  
Chief of Police

c: Chief's Office E-File