

# PERFORMANCE AUDIT



Office of the  
Washington  
State Auditor  
Pat McCarthy

## Law Enforcement Training and Community Safety Act: Progress on training

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## State Auditor's Office contacts

### State Auditor Pat McCarthy

564-999-0801, [Pat.McCarthy@sao.wa.gov](mailto:Pat.McCarthy@sao.wa.gov)

### Scott Frank – Director of Performance and IT Audit

564-999-0809, [Scott.Frank@sao.wa.gov](mailto:Scott.Frank@sao.wa.gov)

### Justin Stowe – Assistant Director for Performance Audit

564-201-2970, [Justin.Stowe@sao.wa.gov](mailto:Justin.Stowe@sao.wa.gov)

### Shauna Good – Principal Performance Auditor

564-999-0825, [Shauna.Good@sao.wa.gov](mailto:Shauna.Good@sao.wa.gov)

### Olha Bilobran – Senior Performance Auditor

564-999-0025, [Olha.Bilobran@sao.wa.gov](mailto:Olha.Bilobran@sao.wa.gov)

### Audit Team

Robert Evashenk, Renee Lewis

### Kathleen Cooper – Director of Communications

564-999-0800, [Kathleen.Cooper@sao.wa.gov](mailto:Kathleen.Cooper@sao.wa.gov)

## To request public records

### Public Records Officer

564-999-0918, [PublicRecords@sao.wa.gov](mailto:PublicRecords@sao.wa.gov)

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# Executive Summary

## State Auditor's Conclusions (page 37)

With the passage of Initiative 940 in 2018, Washington voters transformed police accountability in our state. For example, the standards of I-940 form the basis for our use of deadly force investigation audits, which are unique in the nation.

With this performance audit, we look at another aspect of this landmark law: increased standards for police violence de-escalation and mental health training. Applying both patrol tactics and cultural awareness trainings, the law's intended goal is to improve interactions between officers and community members.

We found that, for the most part, officers in the state are not meeting the requirements established in state law and administered by the Criminal Justice Training Commission.

This report describes obstacles to compliance with the law, including the commission's lack of enforcement ability. Police agencies described problems, too, such as the costs of attending training and covering local duty rosters while officers are attending courses, and the perceptions of some officers that the courses are not relevant. We also documented challenges particular to the training curriculum, including the possibility that the total list of complex topics – 46 – is overly ambitious for 40 hours of training.

Therefore, while the commission has created most of the training courses required, our analysis shows that just 16% of veteran officers and 14% of new officers have completed their required 40 hours of continuing training. At the current rate of officers completing patrol tactics training alone, half of all officers will be noncompliant in 2028.

Our recommendations include increased transparency through better public reporting of data showing officer compliance with the required training. Because many of the issues we identified are intertwined, we also recommend the Legislature convene a work group to address compliance holistically, encompassing officer feedback and financial support for law enforcement agencies to send officers to trainings; it should also clarify the consequences for police agencies and officers that have not complied with training requirements. By addressing the issues raised by our findings, Washington can continue to build better relationships between our law enforcement agencies and the diverse communities they serve.

## Background (page 7)

The nation's first police accountability law requires officers to take violence de-escalation and mental health training. It started as a citizens' initiative known as I-940 and became law in 2019 as the Law Enforcement Training and Community Safety Act. The Criminal Justice Training Commission administers this law. To fulfill its new responsibilities, the commission established training timing, content, duration and deadlines.

The commission was required to develop the curriculum and establish training cycle deadlines for continuing training. The 40 hours of training included 16 hours of mostly online, self-paced community and cultural awareness training and 24 hours of in-person patrol tactics training. The commission's "train-the-trainer" approach addresses the patrol tactics training. While it does not deliver the patrol tactics training itself, the commission supports this training by providing facilities and equipment at several locations around the state. This audit examined progress made by the commission and officers toward completing required continuing training.

## While the commission has developed most required trainings, a more systematic approach would help future training development (page 12)

The commission developed an extensive list of continuing training topics for legally required curricula, which it used to create more than 40 hours of available courses. Community and cultural awareness trainings cover most but not all topics required by law. For patrol tactics, the commission has fully developed training for all but one topic. However, better planning could have helped the commission develop all required topics and review its trainings. With a more systematic approach, the commission could develop future trainings more effectively.

## The law requires compliance, but most officers did not make sufficient progress, and the commission lacks effective tools to ensure participation (page 19)

The law requires all police officers to complete 40 hours of continuing training, but the deadline for completion depends on when the officer graduated from basic academy and received initial certification.

- Only 16% of veteran officers completed 40 hours of continuing training; 42% are at least halfway through completing training required by the 2028 deadline.
- Only 14% of new officers had completed 40 hours of continuing training by their required deadlines.

At the current rate of completing patrol tactics training, about half of all officers will be noncompliant in 2028 and beyond. The commission's train-the-trainer program for patrol tactics struggles in part due to low cooperation from police agencies. In addition, unenforced expectations mean the commission has few tools to encourage participation from uncooperative officers or agencies.

Police representatives offered their opinions about barriers to completing all required training. For patrol tactics, police agencies struggle to commit sufficient resources in terms of both cost and officer-hours for train-the-trainer program success. For community and cultural awareness training, two courses require in-person attendance, making them more difficult to schedule. Some officers are resistant to community and cultural awareness training for personal and political reasons. The commission's communication has also been ineffective, compounding barriers for police agency training managers and officers alike.

### **Lack of necessary data about officers' progress with required training makes it difficult to see whether legal intent is being met** (page 30)

The commission does not require or review compliance with the 40 hours of training, unlike its other programs. While it has data to determine officers' compliance, its reports do not provide this information. In turn, agencies face barriers to tracking their officers' training compliance using the commission's IT system: the commission's inaccurate due dates and incomplete instructions, and agencies' own uncertainty about program structure and varying capacity. Public accountability on officers' progress with the state law is key to meeting legal intent.

### **Recommendations** (page 38)

We made a recommendation to the Legislature to establish a work group that includes stakeholders from the commission, law enforcement and the original citizens' initiative to make the necessary statutory changes to ensure all officers receive training. We also made a series of recommendations to the commission related to updating rules to better reflect current practices. We also recommended

it create a project management plan for developing future trainings, improve communication with law enforcement agencies, increase agencies' ability to monitor compliance, and report publicly on officers' statewide compliance with required training.

## Next steps

Our performance audits of state programs and services are reviewed by the Committee to Hear SAO Performance Audits and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the Office of the State Auditor will review this audit with committee members in Olympia. The public will have the opportunity to comment at this hearing. Please check the committee's website for the exact date, time and location (<https://leg.wa.gov/about-the-legislature/committees/joint/sao-audit-committee/>). Our Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains information about our methodology.

# Background

## Nation's first police accountability law requires officers to take violence de-escalation and mental health training

Nationally, police reform issues have come to the forefront of public attention in recent decades. In Washington, efforts coalesced in 2016 when campaigns supported by the Puyallup Tribe and De-Escalate Washington led to the creation of Citizen Initiative 940 (I-940).

Among their goals: to reduce police use of deadly force and improve communities' trust in law enforcement. The initiative called for officers to take trainings in violence de-escalation and mental health and established an officer's duty to render first aid; it passed in 2018.

According to a study conducted in 2023 by researchers at California State University, Los Angeles, and Arizona State University, community members were 58% less likely to be injured by trained officers compared to officers who did not have necessary training. A study published in 2022 by researchers at the University of Cincinnati found officer injuries decreased by 36% after de-escalation training.

### I-940 became law in 2019 as the Law Enforcement Training and Community Safety Act

Based on the intent of I-940, the Law Enforcement Training and Community Safety Act (sometimes abbreviated as LETCSA) was codified in law in 2019 (RCW 43.101; see Figure 1 in Appendix B for a full list of state laws and agency rules considered in this audit). The law required all law enforcement officers to receive training in violence de-escalation, mental health and first aid.

This report refers to the training described in the Law Enforcement Training and Community Safety Act, which incorporates patrol tactics and community and cultural awareness courses, as "the 40-hour continuing training."

## The Criminal Justice Training Commission administers this law

The Washington State Criminal Justice Training Commission was created in 1974 to establish standards and provide training to criminal justice professionals, including police. It is empowered to certify, and when necessary, decertify, these law enforcement officers.

At the time of its establishment, the commission's responsibilities were mainly to provide basic training for new officers at Basic Law Enforcement Academy (basic academy) at its headquarters in Burien. In recent years, the commission's role and responsibilities have expanded considerably. The commission is now required to:

- Create the rules and process for independent investigations into officer-involved use of deadly force
- Develop and deliver new training on violence de-escalation and mental health
- Decertify police officers for misconduct
- Establish application policies and procedures for the grant program that helps local and tribal law enforcement agencies hire, train and retain new officers

The commission's staffing has more than doubled since the law came into effect.

### To fulfill its new responsibilities, the commission established training timing, content, duration and deadlines

The law required the commission to define and establish many aspects of the new training program, including the timing of when officers were to take violence de-escalation and mental health training during their careers. **Exhibit 1** shows the two periods of time when training occurs – basic training occurs before officer certification and continuing training occurs after certification – and also denotes that this audit did not address the basic training requirements.

#### Exhibit 1 – Specific officer training programs compared to audit scope

Content	Timing	Duration	In/Out of audit scope
Violence de-escalation and mental health training	During Basic Law Enforcement Academy	200 hours	Not included because all new officers take it as a condition of certification; also, a third party* was already evaluating it at the time of our audit
Violence de-escalation and mental health continuing training	Continuing training after certification as an officer	40 hours	In scope of this audit

\* See Appendix B for some information about the third-party evaluation.

Source: Auditor developed based on commission materials.

Law enforcement officers required to take this training include officers employed at police departments, sheriff's offices and state agencies such as the Washington State Patrol. For this report, we will use the more general term "police" or "officers."

The commission then considered the content, duration, delivery methods, the agency division responsible, and deadlines for this new continuing training. These elements are summarized in **Exhibit 2**, and discussed further below the exhibit.

## Exhibit 2 – Officer continuing training content, duration and delivery

Content	Timing	Planned duration	Delivery method	Commission division responsible
Patrol Tactics In-Service	Varies depending on officer's certification date	24 hours	In person	Applied Skills Division
Community and cultural awareness training	Varies depending on officer's certification date	16 hours	Mostly online, self-paced courses in the commission's eLearning library	Advanced Training Division

Source: Auditor developed based on the commission materials.

### *Developing the curriculum*

To develop the course content for the 40 hours of continuing training, the commission, with police and community partners, assembled a list of topics they considered essential and codified the list in WAC 139-11-020 to be included in the trainings. Our analysis of the agency rule identified 46 individual topics the continuing training should cover. (The list is displayed and discussed on pages 13-14 of the Audit Results section in this report.)

Sixteen hours of the training would be delivered mostly online in self-paced courses, while the remaining 24 hours of training would be delivered in person.

The commission split responsibility for developing the 40 hours of continuing training between two of its divisions:

- The Applied Skills Division develops patrol tactics training such as “managing the pace of an interaction” and “alternatives to the use of physical or deadly force”
- The Advanced Training Division develops community and cultural awareness training such as “implicit bias” and “American Muslims”

### *Establishing the training cycle deadlines for completing continuing training*

Though the legislation required the commission to adopt “annual” training requirements for continuing training, the commission specified a three-year training cycle in its rules. The commission said a three-year training cycle was necessary to accommodate both the extent of the new training requirements and the many other training requirements officers must comply with. Depending on their rank and the nature of their responsibilities, the many required training topics could include advanced firearms, child sexual abuse investigations or supervisor training. Community members involved in the citizens’ initiative took part in the rule-writing process, as required by law, and agreed to the three-year cycle.

When developing the rule, the commission also defined different deadlines for officers depending on whether their basic training included the new violence de-escalation and mental health topics. This report grouped them as “new” and “veteran” officers.

- **New officers:** These officers took 200 hours of violence de-escalation and mental health training during basic academy on or after May 2020. These officers must complete a minimum of 40 hours of this required continuing training within three years of their graduation date, and every three years thereafter.
- **Veteran officers:** All officers who did not take violence de-escalation and mental health training during basic academy. These officers must complete their first cycle of a minimum of 40 hours of this required continuing training by January 1, 2028, and every three years thereafter.

Of the roughly 11,000 certified officers in the state as of May 2025, about 3,600 are new officers and about 7,400 are veterans.

## The commission’s “train-the-trainer” approach addresses the 24 hours of in-person patrol tactics training

In 2019, the commission decided it could not efficiently deliver patrol tactics training directly: staff estimated it would take them more than 30 years to train all officers in the state. Instead, the commission adopted a two-step, train-the-trainer model, which certifies a relatively small number of trainers annually, then deploys them to teach many more officers in classes held at their own or another police agency.

To achieve this, the commission contracts with nine officers as lead instructors an 80-hour, in-person, trainers course. Commission staff said lead instructors are employed as officers at a law enforcement agency, and their contract payment rate as a lead trainer is less than their normal salary. While on contract with the commission to teach the 80-hour course, most lead instructors must use leave time; the type of leave, whether paid or unpaid, is up to the trainer and their employer.

1. **To become a certified instructor, an officer must attend the commission’s 80-hour in-person course.** These instructors are also employed as officers at law enforcement agencies and must use leave to go to the training.
2. **Once certified, new instructors are expected to teach the 24-hour in-person patrol tactics training.** The commission does not pay these instructors, meaning the instructor or agencies bear the expense of travel, hotel and overtime.

## The commission provides facilities and equipment at several locations to support patrol tactics training

To offset some of the agencies' costs and facilitate patrol tactics training, the commission set up several training hubs around the state. These facilities provide equipment the commission purchased, lending it to the police agencies that use the space for trainings. According to the commission, the average value of equipment in each hub is about \$46,000.

The commission's first two regional training hubs, in Everett and Yakima, were available from July 2023. By July 2025, it had opened three more in Wenatchee, Vancouver and Tacoma. In its July 2025 report to Legislature, the commission said it anticipated the number of officers trained would increase from about 1,000 officers annually to about 1,600 because of the increased capacity offered by the hubs.

### This audit examined progress made by the commission and officers toward completing required continuing training

Although the commission has established the violence de-escalation and mental health training program and invested time and resources in it since 2019, some community members were nonetheless concerned that officers might not meet their training deadlines. They also sought information about the commission's progress toward fulfilling its own responsibilities.

This audit answered the following question:

- What progress have the Criminal Justice Training Commission and law enforcement officers made on training as required by the Law Enforcement Training and Community Safety Act?

The audit did not examine the curriculum of initial training delivered at basic academy to see if it met legal requirements, but only evaluated the continuing training.

# Audit Results

## While the commission has developed most required trainings, a more systematic approach would help future training development

### Results in brief

The Washington State Criminal Justice Training Commission developed an extensive list of continuing training topics for legally required curricula, which it used to create more than 40 hours of available courses. Community and cultural awareness trainings cover most but not all topics required by law. For patrol tactics, the commission has fully developed training for all but one topic.

However, better planning could have helped the commission develop all required topics and review its trainings. With a more systematic approach, the commission could develop future trainings more effectively.

This report refers to the training described in the Law Enforcement Training and Community Safety Act, which incorporates patrol tactics and community and cultural awareness courses, as “the 40-hour continuing training.”

## The commission has developed a list of continuing training topics for legally required curricula

The commission, working with police organizations and members of the public, developed a list of continuing training topics as specified in state law known as the Law Enforcement Training and Community Safety Act. The related rule developed by the commission lists 46 separate training topics, and requires the commission to develop trainings addressing them. About half are focused on different skills that officers can use to de-escalate encounters with the public; the remainder support better understanding of the communities police may interact with so those interactions proceed with less risk of escalation. The training topics fall into two very broad categories, producing a catalog of more than 40 hours of available trainings:

- 24 hours of Patrol Tactics In-Service, developed by the Applied Skills Division
- More than 16 hours of community and cultural awareness courses, developed by the Advanced Training Division

All training topics in both categories are listed in **Exhibit 3** on the following pages.

**Exhibit 3 – Required topic areas in the 40-hour continuing training developed by the commission in its rules**

Patrol Tactics (17 topics)	Community and Cultural Awareness (28 topics)
Managing distance between officer and persons involved	Historical intersection of race and policing
Using shielding	The experience of Black Americans then and now, from the institution of slavery through the Civil Rights Act of 1964
Managing the pace of an interaction	Mass incarceration
Using communication to increase resolution options and reduce injuries	Role and impacts of police in schools
Recognizing and managing stress impacts on officer perceptions and reactions	Ongoing influence of race relations
Emotional intelligence and self-awareness	Strategies to reconcile past injustice
Psychology and foundational principles of procedural justice	Importance of fair and impartial policing
Ethics	Culture and community awareness, including: <ul style="list-style-type: none"> <li>• Black Americans</li> <li>• African Immigrants</li> <li>• Latinx*</li> <li>• Native Americans</li> <li>• Asian Americans</li> <li>• Pacific Islanders</li> <li>• American Muslims</li> <li>• Sikhs</li> <li>• Arabs</li> </ul>
Behaviors related to mental or behavioral health issues or disability	How biases, stereotypes and lack of cultural understanding negatively impact police interactions
Techniques and communication strategies for those who may have mental or behavioral health issues or other disabilities	History of police interaction with the LGBTQ+ communities
Proper use of nonlethal defensive tactics to gain control when necessary	Effective communication and interaction with: <ul style="list-style-type: none"> <li>• Youth</li> <li>• People who have experienced domestic violence, sexual assault, or human trafficking</li> <li>• Immigrant and refugee communities, and those with limited-English proficiency</li> <li>• People with barriers to hearing, understanding or otherwise complying with law enforcement officers</li> </ul>
Alternatives to the use of physical or deadly force	Systemic challenges facing indigent populations, the nature of crimes and poverty, and the cycle of recidivism for those experiencing poverty

*continued on the next page*

**Exhibit 3 – Required topic areas in the 40-hour continuing training developed by the commission in its rules, *continued***

Patrol Tactics (17 topics)	Community and Cultural Awareness (28 topics)
Decision-making simulator (“shoot/don’t shoot”) and cognitive exercises to improve threat recognition and response	Alternatives to jail, booking and arrest and the effects on members of the community and public safety
“Good faith” standard	History of police interaction with Native American communities
Critical life-saving skills	Tribal sovereignty
Balancing officer duties with the duty to preserve life	Tribal culture and traditions
Best practices for securing a scene for safe and swift first aid	State law notification requirements when a tribal person is killed or injured
<b>1 topic covered by both patrol tactics and community and cultural awareness trainings</b>	
Implicit and explicit bias	

\* “Latinx” used in the WAC as a gender-neutral alternative to the Spanish language’s feminine *Latina* and masculine *Latino*.

Source: Auditor created based on WAC 139-11-020 2(a)-(t).

The topics share the goal of helping police officers be more effective in the field, but take a variety of approaches to reducing the likelihood any given encounter with the public will escalate and result in violence that harms either the officer or the other person. For example, patrol tactics contains the topic areas “Using communication to increase resolution options and reduce injuries” and “Techniques and communication strategies for those who may have mental or behavioral health issue or other disability.” Community and cultural awareness training contains relevant information in the topic “Effective communication and interaction with [for instance] Immigrant and refugee communities, those with limited-English proficiency [and] People with barriers to hearing, understanding, or otherwise complying with law enforcement officers.”

Two topic areas – “Culture and community awareness” and “Effective communication and interaction” – contain lists of specific groups that the related training should address. These groups include Native Americans, Pacific Islanders and American Muslims, as well as young people and people who have experienced domestic violence. Each was specifically included because the stakeholders who helped compile the commission’s rule considered them at an elevated risk for escalation by officers unfamiliar with their cultural norms, experiences or limitations.

**The commission used its extensive list of required topics to create more than 40 hours of available courses**

The commission has developed and made available to the officers more than 40 hours of training courses. The total number of hours incorporates two previously

developed courses – the two-hour Crisis Intervention Training and Deaf Awareness Workshop —which officers can count toward their continuing training requirements while the commission develops new training to meet the law’s requirements. Exhibit 4 shows the full list of violence de-escalation and mental health trainings available to officers.

**Exhibit 4 – Continuing training course titles and course duration**  
*As of October 2025*

Course title	Duration in hours
Patrol Tactics	24
<b>Courses fulfilling the community and cultural awareness requirement:</b>	
Deaf Awareness Workshop	8
Introduction to the Historical Intersection of Race and Policing	3
Effective Communication	2.5
Law Enforcement and Society: Lessons of the Holocaust	2.5
LGBTQ+ Core Competency	2.5
2-hour Annual Crisis Intervention Training	2
The Criminal Legal System: Structural Inequalities, Monetary Sanctions, Policy and Reform	2
Introduction to Indigenous Concepts and Culture	2
Understanding the Diversity and Complexity of Asians and Asian American Communities	1.5
Who are Sikhs?	1
People First: Awareness, Challenges and Response to Poverty and Recidivism	1
<b>Hours of developed training for community and cultural awareness</b>	<b>28</b>

Source: Auditor compiled list based on commission reports, website and interviews with staff.

**The list of continuing training topics appears ambitious, given the time available for officers to take the training.**

The commission worked with a variety of stakeholders to develop the list of training topics that are included in its rules, as shown in Exhibit 3. (A sample of organizations involved is listed in the sidebar.) The scope of our audit was to determine whether those topics are covered in the training the commission has developed. We did not evaluate the effectiveness of the training topics or whether the time allotted for them was sufficient.

Even without an evaluation of the training, there is some limited evidence to raise the question of whether it is possible to effectively cover all the required topics in the time allotted. First, the list of topics is both long and varied, and many of them are very complicated. Examples of such complex issues include the historical intersection of race and policing, the history of police interaction with LGBTQ+ communities, and

**Organizations involved in the commission’s 2019 rule-writing process included:**

- Black Law Enforcement Association of Washington
- Groups advocating for people with a disability
- Groups advocating for immigrants
- Washington Council of Police and Sheriffs
- Washington State Patrol Troopers Association

systemic challenges facing indigent populations – and these are just a few of the topics that are to be covered in the 16 hours allotted for cultural awareness training. Moreover, the commission has already developed 40 hours of total training content, which includes patrol tactics, with more yet to develop. As the commission works with law enforcement to help all officers take this required training, it may be worthwhile considering whether the list of mandated training topics is feasible.

## Community and cultural awareness trainings cover most but not all topics required by law

While the courses available give officers enough hours of training for them to meet the 40-hour requirement, they still do not cover all topics listed in the commission’s own rule. Of the 46 topics listed in Exhibit 3, 28 are to be covered by community and cultural awareness training. (One topic, “Implicit and explicit bias,” is assigned to be covered by both community and cultural awareness training and patrol tactics.) However, our comparison between the topics in the rule and course material currently available to officers found six were missing from the community and cultural awareness course list. The list of missing topics in Exhibit 5 includes three that we confirmed the commission is currently developing.

Five of the six missing topics concern community and cultural groups that the commission and stakeholders considered at elevated risk of escalation in a police encounter. With the delay in rolling out the five trainings, these communities have continued to be at higher risk for five years. It is therefore important the commission complete development of these trainings as soon as possible.

As for the training on “Alternatives to jail, booking and arrest,” its timely addition to the course catalog would help more officers consider nontraditional methods during their encounters with the public that lessen the chance of escalation.

### Exhibit 5 – Community and cultural awareness topics required by WAC 139-11-020(2) not yet available for officers’ training

*As of October 2025; Topics marked (\*) were under development during the audit*

- Latinx
- Pacific Islanders
- Arabs
- African immigrants\*
- American Muslims\*
- Alternatives to jail, booking and arrest\*

Source: Auditor created based on the materials from the commission.

## The commission has fully developed training for all but one patrol tactics topic

Patrol tactics topics account for 17 of the 46 total topics, in addition to “implicit and explicit bias.” These topics include “best practices for securing a scene for safe and swift first aid” and “proper use of nonlethal defensive tactics to gain control

when necessary.” However, our analysis found part of one topic was missing from available trainings.

The topic in question was described in the commission’s rule as: “Use of a decision-making simulator (‘shoot/don’t shoot’) and cognitive exercises to improve accurate recognition of threats and proper level of force response.” The rule specifically mentions using a decision-making simulator, a device that confronts officers with many different scenarios, to test officers’ responses in situations that range from a traffic stop to an active shooter event.

Commission staff said the patrol tactics course covers “threat recognition” but uses other methods to teach the concepts instead of a decision-making simulator. Staff said the simulator was too expensive to make available statewide, and that its use would add extra days to the training schedule. Nonetheless, the actual practice does not align with the rule. The commission acknowledged it needs to update the rule.

## Better planning could have helped the commission develop all required topics and review its trainings

While developing required continuing training on violence de-escalation and mental health, the commission experienced a few challenges that could have been prevented by a project management plan. These challenges include:

- **The commission lacked a clearly defined list of topics to develop and a deadline by which to complete all necessary courses.** Staff did not make a comprehensive list of the courses needed to meet the commission’s goal of supplying the courses that complied with its legal requirements. Furthermore, neither the law nor rule nor the commission itself set a deadline by which all course development must be completed.

Without a clear goal of courses to deliver or a deadline to do so, the commission will continue to struggle with planning the resources it needs to finish training development, and it may not develop all the training it needs to meet legal requirements.

- **The commission lacked a review process to ensure training meets legal requirements.** The review process in place during the audit did not include any instructions to review training content to confirm which of the required topics it covered.

Unless they are certain which requirements each training covers, commission staff may think a requirement has been met when it was not. During the audit, the commission began updating its review policy to ensure courses are reviewed for compliance with legal requirements.

Two other issues arose from limitations in staffing resources and from organizational structures that do not facilitate intra-team communication and collaboration.

- **Inadequate/Insufficient staffing, compounded by competing staff priorities.** Commission managers said they have limited staff assigned to training development and some of the staff have competing priorities. The program manager who leads curriculum development for the community and cultural awareness training also develops other types of training. This employee also has duties related to tasks for the portion of state law pertaining to the Independent Investigations Team within the commission.

Without assigning the proper resources, curriculum development may take much longer. Consequent delays to rolling out continuing training courses means officers cannot access training on all required topics, and thus may not fully apply the principles of those trainings.

- **Siloed teams lead to limited communication and a lack of collaboration between divisions responsible for developing all required training topics.** Staff do not discuss their plans around course development for the topic that is assigned to both the Applied Skills and Advanced Training divisions.

Regular communication between the two divisions would help ensure no topics are missing from the training catalog, and also ensure the courses do not contain contradictory information.

## With a more systematic approach, the commission could develop future trainings more effectively

Although the commission has developed courses to cover most of the required topics, it has yet to complete development and roll out for six topics and part of a seventh topic. Beyond that, commission staff said they would devise refreshed iterations of all courses for future training cycles. For these reasons, the commission needs an effective training development plan. Guidance issued by organizations such as the Project Management Institute (PMI) set out the steps advisable in a formal project plan which could offer the commission a starting point for future planning.

## The law requires compliance, but most officers did not make sufficient progress, and the commission lacks effective tools to ensure participation

### Results in brief

The law requires all police officers to complete 40 hours of continuing training, but the deadline for completion depends on when the officer graduated from basic academy and received initial certification.

- Only 16% of veteran officers completed 40 hours of continuing training; 42% are at least halfway through completing training required by the 2028 deadline.
- Only 14% of new officers had completed 40 hours of continuing training by their required deadlines.

At the current rate of completing patrol tactics training, one of the required training components, about half of all officers will be noncompliant in 2028 and beyond. The commission's train-the-trainer program for patrol tactics struggles in part due to low cooperation from police agencies. In addition, unenforced expectations mean the commission has few tools to encourage participation from uncooperative officers or agencies.

Police representatives offered their opinions about barriers to completing all required training. For patrol tactics, police agencies struggle to commit sufficient resources in terms of both cost and officer-hours for train-the-trainer program success. For community and cultural awareness training, two courses require in-person attendance, making them more difficult to schedule. Additionally, some officers are resistant to community and cultural awareness training for personal and political reasons. The commission's communication has also been ineffective, compounding barriers for police agency training managers and officers alike.

## Different training completion deadlines apply to veteran and new officers

The law requires all police officers to complete 40 hours of continuing training, but the deadline for completion depends on when the officer graduated from basic academy and received initial certification. To assess the progress toward completion made by the state's approximately 11,000 officers certified as of May 31, 2025, we

obtained commission training data for the 17 courses that fulfill the 40 hours of required training (listed in Exhibit 10 on page 35). We then grouped the officers for analysis:

- **Veteran officers** graduated from basic academy before May 2020. This group of about 7,400 officers must complete their first cycle of 40 hours of continuing training by January 1, 2028.
- **New officers** graduated from basic academy between May 2020 and May 2022. This group of about 1,000 officers must complete their first cycle of continuing training three years after graduation.
- **“Very new” officers** graduated from basic academy after May 2022. This group of about 2,600 officers must also complete their first cycle of training within three years after graduation. We excluded this group from our analysis because the dataset did not yet have three years of records to determine their compliance.

In reviewing the data, we identified which of the 17 training courses each officer had completed.

- **For veteran officers**, we counted every course completed once on or before May 31, 2025.
- **For new officers**, we counted every course completed once within three years of graduating from basic academy.

We counted each completed training course once even if the officer completed it multiple times, with one exception. According to the commission, the two-hour Annual Crisis Intervention training can be counted for credit three times in a three-year cycle for a maximum of six training hours.

These results are a snapshot for the officers certified as of May 31, 2025. Each month, the list of certified officers changes as new officers complete basic training and veteran officers retire or otherwise leave service.

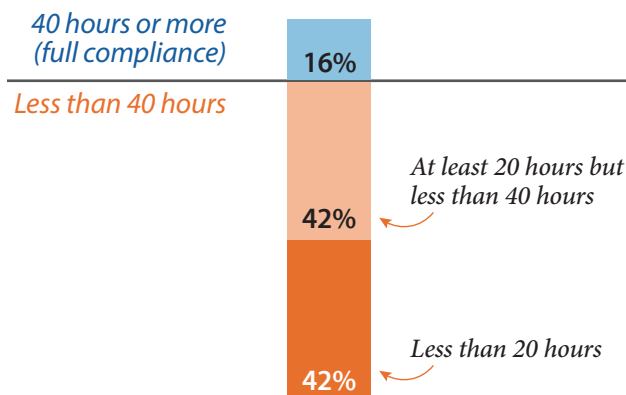
## **Only 16% of veteran officers completed 40 hours of continuing training; 42% are at least halfway through completing training required by the 2028 deadline**

Analysis of commission training data for veteran officers showed about 16% (about 1,200) of veteran officers had already completed 40 hours of continuing training as of May 31, 2025. One group of 42% are at least halfway through completing their training to meet the 2028 deadline. The remaining 42% have completed less than 20 hours of required training. We found only four veteran officers had not completed any hours of training.

These results are shown in **Exhibit 6** on the following page.

### Exhibit 6 – Percentage of veteran officers completing more or less than 40 hours of continuing training

As of May 31, 2025; Out of 7,410 eligible veteran officers



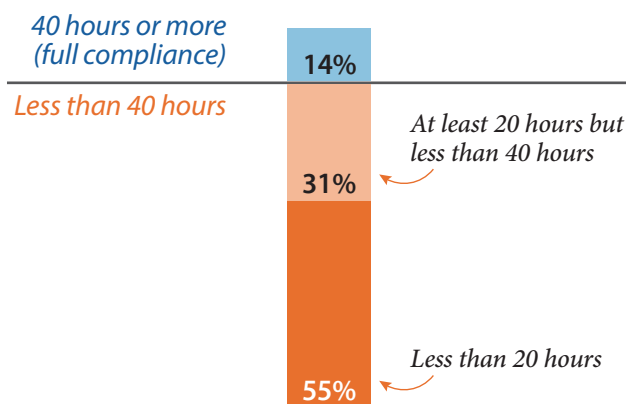
Source: Auditor analysis of commission training data.

### Only 14% of new officers had completed 40 hours of continuing training by their required deadlines

Analysis of commission training data for new officers showed that only 14% (about 140) of new officers had completed 40 hours of continuing training by their required deadlines. We found only two new officers had not completed any hours of this required training within three years of graduating from basic academy. These results are shown in Exhibit 7.

### Exhibit 7 – Percentage of new officers completing more or less than 40 hours of continuing training

As of May 31, 2025; Out of 995 eligible new officers



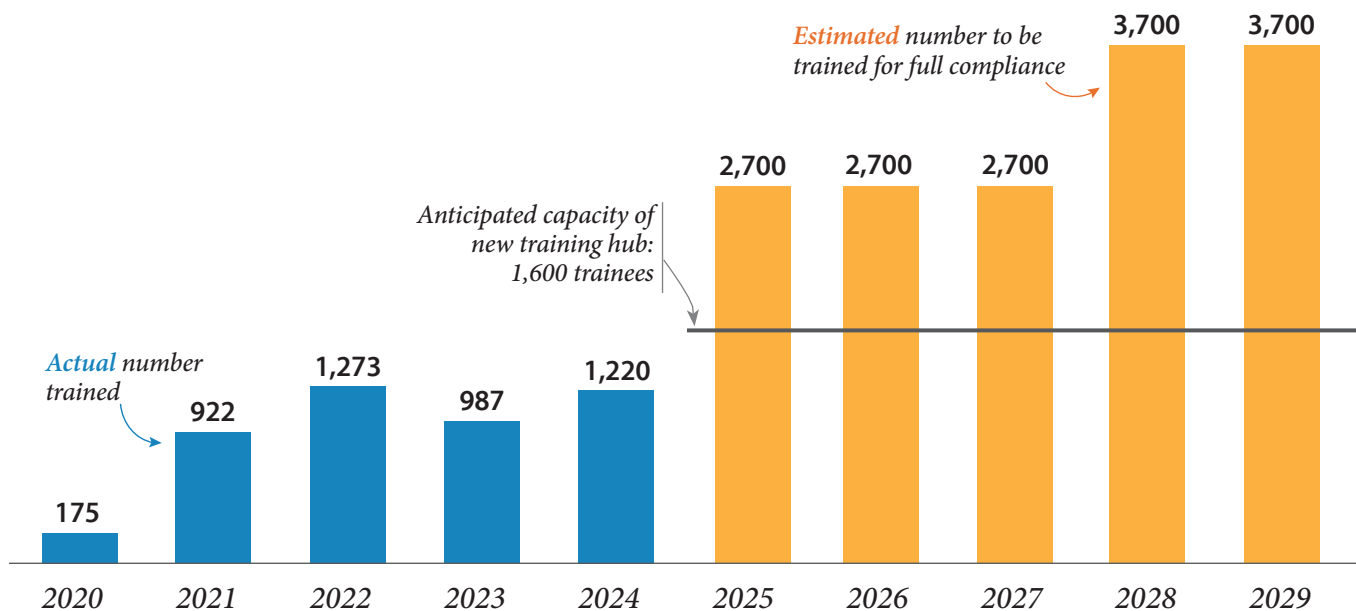
Source: Auditor analysis of commission training data.

## At the current rate of completing patrol tactics training, about half of all officers will be noncompliant in 2028 and beyond

Given the number of officers who have completed patrol tactics training and the number of officers who must do so by 2028, the legal deadline, we estimate that an average of about 2,700 officers must take patrol tactics each year for all officers to be compliant on time. However, the commission’s data showed the greatest number of officers completing patrol tactics in one year (for 2020-2024) was 1,273, as shown in Exhibit 8; this is less than half our estimate. Through the increased availability of training at regional hubs, the commission anticipates increasing the number of officers trained to about 1,600 each year. Nonetheless, this would only meet 60% of our estimate of how many officers need to be trained in a year.

### Exhibit 8 – Actual vs. estimated numbers of officers annually completing patrol tactics training compared to commission training capacity

As of May 31, 2025, from around 11,000 eligible officers



Source: Auditor analysis and the commission’s report to the Legislature, “Violence De-escalation Training Compliance & Implementation” (E2SHB 1310), July 2025.

Patrol tactics training makes up 60% of the required continuing training. Unless there is a significant change to current trends, about half of all officers will be out of compliance with this requirement by January 2028. After 2028, this issue will continue to worsen because by that time, all officers will be on a three-year training cycle. The average rate necessary to train officers in patrol tactics annually will have to increase to about 3,700, or about one-third of the roughly 11,000 total officers.

## The commission's train-the-trainer program for patrol tactics struggles in part due to low cooperation from police agencies

The audit found two shortcomings with the train-the-trainer program that result in too few officers taking the 24-hour patrol tactics portion of the training. These issues consequently reduce officers' overall compliance with the 40-hour training required by law.

First, the commission's development of its train-the-trainer instructor certification program did not include an analysis of how many instructors it would need to ensure the availability of patrol tactics training for all officers in the state. Rather, commission staff said the focus was on ensuring the quality of training delivered by the instructors. To maintain the quality of instructors, the commission issued a "standard operating procedure" in 2019 that set expectations for patrol tactics instructors to take the 80-hour course every two years, teach the 24-hour patrol tactics training at least twice a year, and participate in at least 16 hours of patrol tactics trainings hosted by other agencies. However, the procedure is out of date – the commission has not updated the procedure since October 2022. Furthermore, commission staff said some requirements proved unsustainable, so the commission has not been enforcing the expectations.

Second, the value of having a cadre of certified instructors relies on their ability to actually reach and teach officers what they have learned, and this the commission struggles to fully achieve. Commission staff said that sometimes an instructor wants to teach but their agency will not allow it, placing higher priority on the instructor's other duties as an officer. In such cases, through no fault of the instructor, instructors might not comply with the expectation they teach twice each year. The consequence in the operating procedure stated the instructor would lose certification and be prohibited from teaching until they took the certification course again. In the view of commission staff, doing so is unfair – another reason why the commission has not been enforcing the expectations and for the commission to revise the operating procedure.

### Unenforced expectations mean the commission has few tools to encourage participation from uncooperative officers or agencies

Not only is the commission unable to force instructors to follow through on the expectations to teach patrol tactics, it cannot force officers to attend any of the trainings. The original language of the bill mandated compliance with the full 40-hour training as a condition of officers maintaining their certification. However, an early amendment to the law in 2019 removed that condition: the law simply states the commission must "require compliance." Commission staff said revoking officer certification is a serious and significant consequence, and they did not support

bringing it back. Instead, they described three incentives for officers to take their required training:

- Officers wishing to become a lead investigator for a regional independent investigation team examining officer use of deadly force must first complete 24 hours of patrol tactics training
- Police agencies wishing to become eligible for a grant program allowing them to collect a 0.1% sales tax they can use to hire, train and retain new officers must attain 50% compliance with the 40-hour training requirement
- Patrol tactics instructors may be able to earn compensation for teaching other courses as private contractors, in addition to their normal salary

However, none of these incentives require officers to complete all training, so they are not effective for ensuring full compliance. Without effective incentives or consequences for agencies and officers, officers will be less likely to follow through with all required training and their employers less likely to insist they do so.

## Police representatives offered their opinions about barriers to completing all required training

New and veteran officers who lack 40 hours of training may be missing either patrol tactics training or community and cultural awareness training or both. To understand why officers are not taking these trainings, we invited police agency training managers from the more than 250 police agencies in the state to share their perspectives with us. Twenty-eight different agency representatives did so through focus groups and written comments; 24 of the 28 also completed a short poll of four multiple-choice questions. In their role as training managers, these people are in a position to hear a broad variety of opinions from officers at their agencies.

Focus group attendees represented agencies employing about 2,500 combined, or 23%, of all sworn officers, summarized in Exhibit 9. They held a range of ranks, including undersheriff, deputy chief, captain, lieutenant, commander, sergeant and civilian (non-sworn). They worked at agencies of all levels of government – state, county, city and university – from across Washington – east, central and west.

**Exhibit 9 – Size and number of agencies participating in focus groups**

Size of agency	Number of agencies in group
More than 150 officers	5
Fewer than 150 and more than 30 officers	7
Fewer than 30 officers	7

Source: Auditor compiled.

While their opinions and perspectives cannot be generalized to all officers in the state, they reveal common barriers to officers’ compliance with this required continuing training. To form our conclusions, we considered the information

provided by police agencies and the commission, and conducted independent research to determine whether the commission's relevant processes are working well or warrant corrective action.

## Police agencies struggle to commit sufficient resources in terms of both cost and officer-hours for train-the-trainer program success

Representatives of police agencies said they also find it difficult to allocate enough instructors to teach patrol tactics and to send officers to training because doing so requires a significant commitment of resources, both in terms of cost and officer-hours. New instructors must be freed from their duties to attend the 80-hour course, and then to teach 24 hours of patrol tactics. In addition, an agency must schedule and send all its officers to the 24-hour patrol tactics training at some point every three years. Five barriers to cooperation with the required training recurred most frequently in their comments.

- **Costs to attend training.** Ten respondents said it is expensive to pay for travel, hotel and overtime to send officers to in-person patrol tactics training.
- **Covering duty rosters when officers are away attending training.** Five respondents said sending officers to training is challenging because agencies must keep a minimum number of officers on duty.
- **Patrol tactics instructing and training is not built into normal duty.** While on contract with the commission, most lead instructors must use leave time when teaching the 80-hour course (the type of leave, whether paid or unpaid, is up to the instructor and employer). The commission was only aware of one lead whose agency considered teaching the 80-hour course part of the officer's normal duty. Three respondents said their officers attend the 24-hour training on their days off or on overtime, instead of training as part of their normal duty. One commented that scheduling training on officers' days off imposes on their much-needed rest.
- **Insufficient number of instructors and available sessions.** Five respondents said there were not enough patrol tactics instructors or available sessions to train all officers by the deadline. After analyzing commission's data on trainers, we found the commission trained about 670 instructors between 2019 and 2024, but only one-third of them have actually gone on to teach the course.
- **Unreliable partnerships between law enforcement agencies.** The commission relied on the idea of neighboring jurisdictions partnering on trainings, such as sending officers to joint training. However, six respondents said those partnerships are sometimes unreliable, and gave examples in which the hosting agency completely filled the class with its own officers or canceled the training.

Unless and until police agencies commit the necessary resources, both in money and in officer-hours, the commission's train-the-trainer approach to patrol tactics training will not succeed.

## **Two community and cultural awareness trainings require in-person attendance, making them more difficult to schedule**

Two of the community and cultural awareness courses – “Law Enforcement & Society: Lessons of the Holocaust” and “Deaf Awareness Workshop” – feature live instruction, so officers must schedule to train at a specific time and place. While the former is only 2.5 hours, the Deaf Awareness Workshop is an 8-hour course, making up 20% of the 40 total hours and half of the community awareness hours. Attendee numbers may be limited, so being able to take either course also depends on the available spots.

Officers can take all other community and cultural awareness training courses online, from any location and in small increments of one to three hours. These courses are also self-paced, meaning that officers can take them at whatever time of day is best for their schedule. One representative said the self-paced trainings are easier to obtain officer compliance: “If I don't have to schedule and reschedule officers into limited spots for a class like the Lessons of the Holocaust, it's much simpler for me to force compliance at my agency.”

## **Some officers are resistant to community and cultural awareness training for personal and political reasons**

Some officers are resistant to taking these community and cultural awareness training courses based on personal and political views. Four respondents said that officers at their agencies complain about community and cultural awareness training. They described officer complaints that some content in the courses appeared to be biased or condescending to police officers, particularly in the way information was presented. One representative pointed to changes made to diversity, equity and inclusion policies under the federal administration in 2025, noting that some officers said the state's community and cultural awareness training requirements were political and could just as easily change again if state politics change.

The commission's managers also mentioned officer resistance. For example, officers question the relevance of the “Lessons of the Holocaust” course to their work.

## The commission's communication has been ineffective, compounding barriers for police agency training managers and officers alike

The commission is legally responsible for developing the rules and curriculum of the 40-hour training program. The people who schedule and administer the courses at police agencies large and small rely on the commission to understand the program and their roles, and in turn help ensure their officers meet the state's requirements.

Clearly communicating rules and expectations is essential because if people do not understand what they are supposed to do, they are less likely to do it correctly. The Standard for Program Management, issued by the Project Management Institute, suggests program managers capture common questions and publish them with correct answers so everyone who needs them can benefit from the information. The Standard also advises program managers to plan engagement and communication. The plan should consider communication format, content and level of detail, such as by mapping the organization's channels and how each channel distributes information. The plan should also include metrics to measure engagement activities and the effectiveness of the communication reaching intended audience.

The commission provided program guidance through multiple channels, including its published rules, website, emailed newsletters and annual summits, but none was comprehensive, supplying all answers in one place. Multiple sources for program guidance also make it harder for users to find specific information or answers. Seven of the 28 respondents said they found it difficult to get answers from commission staff. One said "information [about the training] is out there, but they must stumble on it – there is no easy way to get answers for everything."

An analysis of the information the commission provides regarding the training program identified the following examples of questions with difficult-to-find answers. (Underlined text indicates the sources we consulted to find answers.)

- ***Which training courses count toward the 40-hour requirement?*** There is no complete list of available courses that count toward the 40-hour training requirement. The commission's website has a page of frequently asked questions, but the question of which courses count did not appear on the list. Neither the rules nor the website explain whether the required training must include all 46 topic areas or officers must simply take 40 hours of courses. Agency respondents said they were confused about which training courses count: half did not know that Deaf Awareness Workshop counts, and two did not know that patrol tactics counts toward required hours. Two were also confused about the source of training – they thought any external training should count toward required hours as long as they

taught the required topics. The commission's program manager said the commission plans to issue guidance to agencies with a policy to clarify this question.

- ***How is the curriculum organized?*** The commission's rules state officers must take a minimum of 40 hours of continuing training. However, the commission's rules do not explain the relationship between 24 hours of patrol tactics and 16 hours of community and cultural awareness topics. The commission's website also does not explain this information – it simply says 40 hours are required. The commission also provided this answer inconsistently through its emailed newsletter; it was not included in every email. Auditors found this information in the 2022 annual summit conference slide show – which very few agencies attend in person, suggesting not all agencies would have seen the presentation at the summit. When asked, 42% of agency respondents said that the law required a minimum of 24 hours – the commission's rules actually require a minimum of 40 hours. One said they were under the impression that patrol tactics satisfies the law and that if they are wrong, adding online courses as well will make it “exponentially harder to track” training results.
- ***When is training due?*** The commission's rules do not define the continuing training due date for new officers – agencies must consult both the commission's website and summit slides to gain certainty. The commission's answer through emailed newsletters was inconsistent – three included the due date for new officers, two others did not. Additionally, when describing the due dates for different types of officers in its rules and on its website, the commission used the term “incumbent” without defining the term. When asked, 25% of respondents did not know the training due date for new officers was three years after basic academy graduation, and one incorrectly answered that veteran officers must complete their first cycle by December 31, 2025.

Aside from the haphazard locations of important information, we found instances in which the commission's distribution of its messages did not reach all agencies. For example, the commission left off several agencies from emailed newsletter distribution lists. Commission staff said they unintentionally omitted those agencies, and they corrected the distribution lists after we notified them of the mistake. In another example, the commission presents information about the program at its annual summits. However, according to the commission's rules, the event's primary purpose is to seek community input on training and recruit subject matter experts. In addition, commission staff said the summits are not well attended by law enforcement. As a result, training managers may not realize summit content sometimes includes program guidance. A couple of respondents said they were not even aware of the summits, even though the commission sends notices about these events.

Law enforcement agencies depend on the commission to clearly communicate their responsibilities regarding the training program, but the commission's messages to

agencies are not reliably reaching those who need the information. One respondent summarized the feelings of one focus group, saying they are supposed to be the agency experts but they do not all understand the program requirements. This person went on to say if the training managers are confused, they would expect line-level officers to have “no idea” of their own training needs.

## Lack of necessary data about officers' progress with required training makes it difficult to see whether legal intent is being met

### Results in brief

The commission does not require or review compliance with 40 hours of training, unlike its other programs. While it has data to determine officers' compliance, its reports do not provide this information. In turn, agencies face four barriers to tracking their officers' training compliance using the commission's IT system: the commission's inaccurate due dates and incomplete instructions, and agencies' own uncertainty about program structure and varying capacity. Public accountability on officers' progress with the state law is key to meeting legal intent.

## The commission does not require or review compliance with 40 hours of training, unlike its other programs

Even though state law says the commission “must require compliance” with the 40-hour training program on violence de-escalation and mental health, it does not do so. Nor does the commission review available data to confirm that police agencies can demonstrate compliance.

Staff said the commission retains officer records of training completion, but they do not have a process to review whether an officer has complied with this continuing training requirement. They consider that course-by-course records satisfy the legal compliance requirements of its rules. They also said it is the responsibility of individual police agencies to track compliance, and they communicated as much through emailed newsletters. However, based on a review of emailed newsletters provided by the commission, we did not see evidence that the commission informs them of this responsibility. Moreover, staff said they lack authority to impose any consequences upon out-of-compliance officers.

This lack of requirement or review differs from two other commission training programs. Specifically:

- **Annual in-service** – Commission website requires police agency officials to attest that their officers have completed this training
- **Two-hour Annual Crisis Intervention** – Commission staff create an annual report to identify officers that have not completed this training

For these two programs, the commission explicitly says on its website that it will regard police agencies as noncompliant if their officers fail to take required training. However, the commission does not provide such statement for the 40 hours of violence de-escalation and mental health training.

## The commission has data to determine officers' compliance, but its reports do not provide this information

The commission maintains records on the 40-hour continuing training in its learning management system, as required by law and regulations. This assures the commission has the necessary data to determine whether officers completed both patrol tactics and community and cultural awareness training by their deadlines. We examined documentation for both sections in the commission's learning management system and found it collects the records it retains differently:

- **For patrol tactics training provided by police agencies, commission staff use documentation agencies provide to confirm officers have completed the course.** Records submitted by agencies include copies of the materials presented, sign-in sheets documenting who attended and attendee test results.
- **For community and cultural awareness training that it provides through its online training portal, commission's system automatically tracks individual course completion and retains records.** The retained records include which officers have taken which training courses, the date of completion and test scores.

## The commission's public reports offer an incomplete picture of agencies' and officers' progress with training

State law requires the commission to report data on agencies' and officers' compliance with the 40-hour training, but we found the commission's reports to the Legislature were inconsistent, incomplete and inaccurate.

- **Inconsistent statistics between reports.** For example, the commission's December 2024 report listed the top 10 agencies by patrol tactics completion, with statistics on the number of officers trained by region and the overall percentage of officers trained. However, despite the legal requirement to report compliance by agency, such statistics did not appear in the commission's July 2023 report or its more recent July 2025 report.
- **Incomplete course information.** The reported statistics are only for the 24 hours of patrol tactics training and do not include the required 16 hours of community and cultural awareness training.

- **Inaccurate data.** The reported number of officers completing patrol tactics is misleading because the report includes training data for some people who took the training but are no longer officers. Thus, it does not give an accurate view of current officers' compliance.

Despite the commission having all the training data on officers' violence de-escalation and mental health training, its reports contain inaccuracies or omissions. As a consequence, these reports to the Legislature do not give an accurate view of current training completion status at any level: regionally, by police agency or by individual officer. Lacking this information means legislators and the general public cannot be sure officers have trained on the material considered essential in state law or commission rules.

## Agencies face four barriers for tracking their officers' training compliance using the commission's IT system

The commission said police agencies are responsible for tracking officers' training compliance with the 40-hour training program. However, agency representatives said they face a variety of problems in using the commission's learning management IT system to obtain records they need to track compliance. In addition to agency testimony, we found shortcomings with the commission's IT system that result in four barriers agencies face for compliance monitoring. Some of these issues may be more straightforward to overcome at well-resourced agencies, while smaller or more poorly resourced agencies are likely to struggle more.

1. Commission staff assigned global "due dates" in the learning management system that are inaccurate, conflicting with actual completion deadlines
2. Agency representatives' uncertainty of program structure and content hinders their ability to ensure officer compliance
3. The commission's instructions on how to use the data reporting component of the system are incomplete
4. Agencies vary in their capacity to use the commission's system or other methods to track officers' compliance with this training

## 1. Commission staff assigned global “due dates” in the learning management system that are inaccurate, conflicting with actual completion deadlines

The next four sections of this chapter discuss each barrier in more detail.

In developing the processes for rolling out the 40-hour training to police agencies and officers, the commission’s leadership decided that new eLearning courses would be assigned to officers’ training programs whenever they were released. In the commission’s view, doing so was beneficial because an assigned training appears in the officer’s training profile, bringing greater awareness to officers and agencies that the course is available and officers are required to take it. On a mechanical level, the learning management system requires the entry of a due date whenever training is assigned. Commission staff assigned the same global due date for each course to all officers; the program manager overseeing the 40-hour training said it was not feasible to set personalized due dates for about 11,000 officers because they all have different training deadlines.

These assigned, global due dates, however, often conflict with the officers’ actual training cycles and deadlines, leading to inaccuracies and confusion on the part of police agency training managers.

- Commission staff assigned most officers a due date of January 1, 2028, for online training. This is incorrect for new officers, whose due dates could be sooner, depending on when they graduated from basic academy.
- Commission staff assigned some officers arbitrary due dates for some trainings as far out as 2034. Staff said they set the due date far in the future, so the training does not expire from the officers required training list before the true deadline.
- Commission staff do not assign due dates for officers hired after a training course has been launched. This means officers certified after a course was released will not have it on their required training list unless the agency’s training manager assigns it.

Law enforcement training managers who are unaware of these issues will be unable

## 2. Agency representatives’ uncertainty about program structure and content hinders their ability to ensure officer compliance

to accurately track their officers’ compliance. Two agency representatives said they believed the due dates in the learning management system were the true deadlines.

To accurately determine compliance with the 40-hour training program,

police agency staff must have a clear understanding of the program structure and contents. Without a clear understanding of which courses count, how the curriculum is organized and when training is due, agency representatives said they struggle to manage their officers' training schedules. The commission has issued some course information and guidance to police agency training managers, but it appears inadequate to overcome the barrier of uncertainty at police agencies.

Six respondents said they were so unclear on the requirements they would not know how to track individual officers and determine whether they were meeting the 40-hour requirement. One respondent expressed frustration, saying “every

### 3. The commission's instructions on how to use the data reporting component of the system are incomplete

officer has their own training deadline, which as the supervisor, is impossible for me to manage and know who needs what – it was an impossible task to ask any agency to do.”

Commission staff said it was not feasible to provide a data analytics tool that suited every police agency, and agency training managers must perform their own analyses with the commission's data. The commission's website offers managers instructions on how to generate a general training data report from its learning management system. However, it lacks instructions on conducting additional steps in Excel to view only the records they need to examine officer compliance with the 40-hour training.

The general data report produced by following the commission's instructions contains all training that officers have completed, which means the training manager would need to know which training courses count expressly toward the 40-hour requirement and which columns of the report to filter to see only those courses. Unfortunately, doing so is difficult based on the labels of the commission's data report fields. For example, the learning management system does not indicate that patrol tactics and two-hour Annual Crisis Intervention trainings are part of the 40-hour training program. It also lacked information about which trainings count toward required hours.

In the absence of an official list, we compiled the courses in **Exhibit 10** (on the following page) from multiple sources. The commission has discontinued some of them and replaced them with new courses. Even though the discontinued courses are no longer available to officers, those completed earlier still fulfill an officer's training requirement. This further complicates a training manager's task of tracking compliance.

**Exhibit 10 – All continuing training courses that fulfill the requirement for 40 hours of training over three years**

*As of October 2025*

Course title	Total hours of training
Patrol Tactics	24
<b><i>Courses fulfilling the community and cultural awareness requirement:</i></b>	
Deaf Awareness Workshop	8
2-hour Annual Crisis Intervention Training	6
Introduction to the Historical Intersection of Race and Policing	3
Effective Communication	2.5
Law Enforcement and Society: Lessons of the Holocaust	2.5
LGBTQ+ Core Competency	2.5
The Criminal Legal System: Structural Inequalities, Monetary Sanctions, Policy and Reform	2
Introduction to Indigenous Concepts and Culture	2
Understanding the Diversity and Complexity of Asians and Asian American Communities	1.5
Who are Sikhs?	1
People First: Awareness, Challenges, and Response to Poverty and Recidivism	1
<b>Total hours currently available for community and cultural awareness</b>	<b>32</b>
<b><i>Discontinued courses fulfilling the community and cultural awareness requirement:</i></b>	
Diversity and Cultural Competency for Law Enforcement	1.5 hours
Human Trafficking Awareness	25 minutes
Building Relationships in the Community	18 minutes
De-escalating a Mental Health Crisis	16 minutes
Policing the Homeless	15 minutes
<b>Total hours of discontinued community and cultural awareness</b>	<b>2 hours 44 minutes</b>

Source: Auditor compiled list based on commission reports, website and interviews with staff.

In addition, the general training report lacked information on training cycle start dates. Such information is essential if training managers are to use the commission’s data to track officer compliance, but they would need to obtain training start dates from another source, for example, either a second report from the commission’s system or from the individual personnel records of each officer.

#### 4. Agencies vary in their capacity to track officers’ compliance with this training

Finally, a police agency training manager would need to use analytic tools to combine the two sources of data (the commission’s general report and source of start dates) to be able to track progress in complying with the 40-hour training

program. Simply counting the appropriate training courses that each officer completed is in itself not straightforward given the variety of courses offered over the years and possibility of other trainings counting toward compliance.

Some agencies have resorted to specialized in-house systems or employed dedicated staff to track officers' training compliance. However, not all agencies have staff capable of those methods or data analyses. Nine training managers said they have difficulty using the learning management system. One said trying to track a three-year cycle and the different trainings is difficult: even the agency's "Excel whiz kid" does not know how to do that on a spreadsheet. Finally, while some agencies have dedicated staff for monitoring training requirements, tracking training at another may be just one part of one person's job.

## Public accountability on officers' progress with this state law is key to meeting legal intent

Public reporting of data that shows officers' compliance with the required minimum of 40 hours of violence de-escalation and mental health training is essential for accountability, and may also increase officer and agency motivation to complete training. The lack of accountability demonstrated by the commission's failure to publish reliable, accurate and complete reports risks undermining the benefits of the program – to make officer encounters with the public safer for both parties.

To increase accountability and compliance with this important law, the Legislature, commission and law enforcement organizations and agencies must take the actions described in our report's recommendations. These actions, together with informed community participation, will help Washington achieve the program goals set out in state law.

# State Auditor's Conclusions

With the passage of Initiative 940 in 2018, Washington voters transformed police accountability in our state. For example, the standards of I-940 form the basis for our use of deadly force investigation audits, which are unique in the nation.

With this performance audit, we look at another aspect of this landmark law: increased standards for police violence de-escalation and mental health training. Applying both patrol tactics and cultural awareness trainings, the law's intended goal is to improve interactions between officers and community members.

We found that, for the most part, officers in the state are not meeting the requirements established in state law and administered by the Criminal Justice Training Commission.

This report describes obstacles to compliance with the law, including the Commission's lack of enforcement ability. Police agencies described problems, too, such as the costs of attending training and covering local duty rosters while officers are attending courses, and the perceptions of some officers that the courses are not relevant. We also documented challenges particular to the training curriculum, including the possibility that the total list of complex topics – 46 – is overly ambitious for 40 hours of training.

Therefore, while the Commission has created most of the training courses required, our analysis shows that just 16% of veteran officers and 14% of new officers have completed their required 40 hours of continuing training. At the current rate of officers completing patrol tactics training alone, half of all officers will be noncompliant in 2028.

Our recommendations include increased transparency through better public reporting of data showing officer compliance with the required training. Because many of the issues we identified are intertwined, we also recommend the Legislature convene a work group to address compliance holistically, encompassing officer feedback and financial support for law enforcement agencies to send officers to trainings; it should also clarify the consequences for police agencies and officers that have not complied with training requirements. By addressing the issues raised by our findings, Washington can continue to build better relationships between our law enforcement agencies and the diverse communities they serve.

# Recommendations

## For the Legislature

To resolve the issues identified in the audit concerning the delivery of the training – which transcend any one entity – and make necessary statutory changes to ensure all officers receive the training, as described on pages 15-16 and 22-26, we recommend the Legislature:

1. Establish and formalize a work group that includes representatives from the Criminal Justice Training Commission, the Washington Association of Sheriffs and Police Chiefs, the Washington Council of Police and Sheriffs, state law enforcement agencies such as the Washington State Patrol, and community representatives, such as members of groups involved in the original citizens' initiative. The Legislature may add other participants it deems necessary.

The work group's purpose is to make necessary statutory changes to ensure all officers receive the training. Among the issues the work group should address include:

- a. Financial support for law enforcement agencies and the commission to enroll officers to become patrol tactics instructors (the 80-hour “train the trainer” course)
- b. Support for law enforcement agencies to send officers and patrol tactics instructors to the patrol tactics training (the 24-hour training that is part of the legally required 40-hour training)
- c. A framework or process for formal partnerships, such as by contract or memorandum of understanding, for law enforcement agencies to cooperate on providing patrol tactics training
- d. The number of patrol tactics instructors and frequency of training needed to deliver the training to all officers in the state by required deadlines
- e. Consequences for agencies, instructors and officers for not complying with the training requirements. This might include:
  - Issuing a formal declaration of noncompliance
  - Setting additional expectations through amendments to the law as needed
- f. Alternative delivery methods to train-the-trainer approach
- g. Whether the required hours and list of topics are feasible

## For the Criminal Justice Training Commission

To ensure the rule reflects current practices and terminology used by the commission and police officers, as described on page 17, we recommend the commission:

2. Update its rule WAC 139-11-020

To ensure training on all required topics is developed, as described on pages 16-18, we recommend the commission:

3. Create a project management plan that has:
  - a. A deadline to complete the first iteration of all trainings needed to cover all required topics
  - b. Identified the staffing, equipment and other resources required to develop all necessary training courses
  - c. Documented roles and responsibilities between staff involved in training development, and establish a communication protocol between groups

To reduce confusion related to understanding these training requirements and to improve communication with law enforcement agencies, as described on pages 27-29, we recommend the commission:

4. Complete program guidance for officers and training managers on how to meet requirements. The guidance should include a list of all courses that count, how the curriculum is organized and how to determine officer training cycle and deadlines.
5. Publish guidance where everyone who needs it can benefit from the information
6. Solicit feedback from police agencies to measure effectiveness of the commission's communications with agencies
7. Address the remaining communication barriers identified in this report, as described on pages 28-29

To increase transparency on whether the intent of state law is being met, as described on pages 30-32, we recommend the commission:

8. Establish a monitoring strategy to improve tracking of officers' compliance with the 40-hour training requirement
9. Modify its reports to include statistics for compliance with the 40-hour training requirement

To increase law enforcement agencies' understanding of functionality in the commission's training management system, and their ability to track compliance with the required 40 hours of training, as described on pages 32-36, we recommend the commission:

10. Correct information included in the system's reports, such as legal references and trainings that count toward the 40 required hours
11. Address the inaccurate data field labeled "due date"
12. Solicit input from agencies' representatives for solutions to address any remaining issues such as:
  - a. Any changes needed, such as to the system or report format, that help make it easier for agencies to track compliance
  - b. Any changes needed to the commission's guidance on the help desk of its training management system, Acadis, to provide instructions to law enforcement agencies about how to track compliance
  - c. Additional training from commission staff for training managers on how to use this system to track officer compliance

# Agency Response



## STATE OF WASHINGTON

March 20, 2026

Honorable Pat McCarthy  
Washington State Auditor  
P.O. Box 40021  
Olympia, WA 98504-0021

Dear Auditor McCarthy:

Thank you for the opportunity to review and respond to the State Auditor's Office (SAO) performance audit report "Law Enforcement Training and Community Safety Act (LETCSA): Progress on Training." The Washington State Criminal Justice Training Commission (WSCJTC) appreciates the SAO's efforts to analyze the development and delivery of LETCSA training to certified peace officers in Washington state. The WSCJTC recognizes the complexity of LETCSA, and we appreciate your staff's effort to better understand the program's requirements.

The LETCSA program staff have made significant progress in developing the required training for the program. Since its inception, all relevant divisions at the WSCJTC achieved major milestones toward the development and implementation of LETCSA. Some examples include completing and releasing over 40 hours of LETCSA training, expanding regional training hubs for patrol tactics training, and collaborating with diverse subject matter experts from across the state.

The content developed by the LETCSA staff is continually evolving and expanding to include community collaborators so it aligns with state law and best practices. This work continues to contribute to the WSCJTC's vision of advancing standards of excellence within the criminal justice professions so the people of Washington state live in safe and secure communities.

The WSCJTC generally agrees with the findings and recommendations in the report. Some findings reflect work that was already in progress prior to the audit by the WSCJTC, but it is encouraging to see the SAO's recommendations align with these ongoing efforts. The WSCJTC believes some of the recommendations will require additional funding and staff resources to implement.

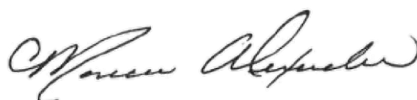
The Honorable Pat McCarthy  
March 20, 2026  
Page 2

The WSCJTC remains committed to providing effective community engagement as part of LETCSA development. We will apply the SAO's recommendations as resources allow and as part of existing continual improvement processes.

Sincerely,



K.D. Chapman-See  
Director  
Office of Financial Management



Monica Alexander  
Executive Director  
Washington State Criminal Justice Training Commission

cc: Shane Esquibel, Chief of Staff, Office of the Governor  
Franklin Plaistowe, Chief Operations Officer, Office of the Governor  
Debbie Driver, Legislative Director, Office of the Governor  
Kenneth Martin, Policy Director, Office of the Governor  
Jesse Jones, Director, Your Washington, Office of the Governor  
Tammy Firkins, Performance Audit Liaison, Your Washington, Office of the Governor  
Jerrrell Wills, Deputy Director, Washington State Criminal Justice Training Commission  
Scott Frank, Director of Performance Audit, Office of the Washington State Auditor

## OFFICIAL RESPONSE TO THE PERFORMANCE AUDIT ON LAW ENFORCEMENT TRAINING AND COMMUNITY SAFETY ACT: PROGRESS ON TRAINING MARCH 20, 2026

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The Washington State Criminal Justice Training Commission (WSCJTC) and Office of Financial Management (OFM) provide this management response to the State Auditor's Office (SAO) performance audit report received February 20, 2026.

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### SAO PERFORMANCE AUDIT OBJECTIVES:

The SAO's performance audit addressed this question:

1. What progress have the Washington State Criminal Justice Training Commission and law enforcement officers made on training as required by the Law Enforcement Training and Community Safety Act?

---

The SAO's first recommendation was to the Legislature.

### SAO's Recommendations 2-12 to the WSCJTC in brief:

**Recommendations 2:** To ensure the rule reflects current practices and terminology used by the commission and police officers:

2. Update its rule WAC 139-11-020

**STATE RESPONSE:** The WSCJTC agrees that updating WAC 139-11-020 would be an improvement and would ensure that the rule reflects current practices and terminology.

### Action Steps and Time Frame

- Any rule adopted by the WSCJTC must be heard and approved by the Governor Appointed Commission. The WSCJTC staff cannot provide a time frame by when proposed changes will be accepted and/or implemented. On March 10, 2026, WSCJTC staff filed the CR-101 with the Code Reviser's Office to begin the rulemaking process for WAC 139-11-020. The current goal is to have the Governor Appointed Commission hear and adopt the edits at the regularly scheduled June 2026 Commission meeting.

---

**SAO Recommendation 3:** To ensure training on all required topics is developed:

3. Create a project management plan that has (a) deadline for the first iteration of all trainings on required topics; (b) identified necessary resources to develop courses; (c) documented roles and communication protocols.

**STATE RESPONSE:** The WSCJTC agrees that utilizing a project management plan may be beneficial. While the vast majority of the course work has already been developed and delivered, WSCJTC will implement a project management plan to ensure the successful and timely completion of applicable training content. Prior to the performance audit beginning, WSCJTC staff had already begun the process for creating training on the remaining topics in WAC 139-11-020.

### Action Steps and Time Frame

- The WSCJTC will utilize current best practices in project management to create a plan that maps out the work that is currently in progress or yet to be completed by December 30, 2026.
- 

**Recommendations 4-7:** To reduce confusion related to understanding training requirements and improve communication with law enforcement agencies:

4. Complete program guidance for officers and training managers on how to meet requirements. The guidance should include a list of all courses that count how the curriculum is organized, and how to determine officer training cycle and deadlines.
5. Publish guidance where everyone who needs it can benefit from the information.
6. Solicit feedback from police agencies to measure effectiveness of the commission's communications with agencies.
7. Address the remaining communication barriers identified in this report (*described on page 28-29*).

**STATE RESPONSE:** The WSCJTC generally agrees that improvements to communication with law enforcement agencies will be helpful.

### Action Steps and Time Frame

- The WSCJTC will work to provide additional guidance on the program and how to meet requirements. The updated guidance will be made widely available on the WSCJTC website and by other appropriate means. By January 2027.
  - Additional work will be performed to solicit feedback from police agencies to better understand existing barriers and to enact solutions. By September 2026.
- 

**SAO Recommendation 8-9:** To increase transparency on whether the intent of state law is being met:

8. Establish a monitoring strategy to improve tracking of officers' compliance with the 40-hour training requirement.
9. Modify reports to include statistics for compliance with the 40-hour training requirement.

**STATE RESPONSE:** The WSCJTC agrees that increasing transparency on the status of meeting state law would be beneficial. However, successfully implementing recommended steps will require additional staff and funding. Current resource constraints may inhibit WSCJTC from effectively addressing these recommendations.

### Action Steps and Time Frame

- The WSCJTC will identify whether additional resources are needed to implement a monitoring strategy and improve tracking of officers' compliance with the 40-hour requirement. By December 2027.
  - The WSCJTC will work to determine how best to include statistics for compliance with the 40-hour requirement in WSCJTC reporting. By July 2026.
-

**SAO Recommendation 10-12:** To increase law enforcement agencies' understanding of functionality in the commission's training management system, and their ability to track compliance with the required 40 hours of training:

10. Correct information included in the system's reports, such as legal references and trainings that count toward the 40 required hours.
11. Address the inaccurate data field labeled "due date."
12. Solicit input from agencies' representatives for solutions to address any remaining issues such as:
  - a. Any changes needed, such as to the system or report format, that help make it easier for agencies to track compliance.
  - b. Any changes needed to the WSCJTC's guidance on the help desk of its training management system, Acadis, to provide instructions to law enforcement agencies about how to track compliance.
  - c. Additional training from WSCJTC staff for training managers on how to use this system to track officer compliance (system or report format, changes to the commission's guidance on Acadis to provide instructions about how to track compliance, and additional training from commission staff on how to use the system to track officer compliance).

**STATE RESPONSE:** The WSCJTC generally agrees that improvements to the training management system, Acadis, would be beneficial. However, there are multiple factors outside of WSCJTC's control which create challenges to enacting recommendations 10-12. First and foremost, WSCJTC is not the proprietary owner of Acadis. Rather, WSCJTC is a paid subscriber. The feasibility of successfully implementing changes depends on whether or not Acadis will agree to enact requested changes. Acadis may decline to enact proposed changes. Second, change requests to Acadis require securing additional funding to pay for any proposed changes.

#### **Action Steps and Time Frame**

- The WSCJTC will initiate the process of identifying improvements and additional funding needed to the training management system, Acadis. By January 2027.
-

# Appendix A: Initiative 900 and Auditing Standards

## Initiative 900 requirements

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor’s Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor’s Office to “review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts.” Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies 10 elements that are to be considered within the scope of each performance audit. The State Auditor’s Office evaluates the relevance of all 10 elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	<b>No.</b>
2. Identify services that can be reduced or eliminated	<b>No.</b>
3. Identify programs or services that can be transferred to the private sector	<b>No.</b>
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	<b>Yes.</b> The audit identified a gap between commission expectations regarding patrol tactics in-service training and police agencies’ understanding of and ability to deliver this training, and made recommendations to address the gap.
5. Assess feasibility of pooling information technology systems within the department	<b>No.</b>
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	<b>No.</b>

## I-900 element

## Addressed in the audit

7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	<b>Yes.</b> The audit recommended the Legislature and the commission consider both statutory and regulatory changes to help improve the required 40-hour training program.
8. Analyze departmental performance data, performance measures and self-assessment systems	<b>No.</b>
9. Identify relevant best practices	<b>Yes.</b> The audit identified best practices related to project management and communication between the commission and police agencies.
10. Analyze the social equity impact of programs or services	<b>No.</b> While this audit did not specifically analyze social equity impacts of the 40-hour training program, it did note that delays in delivering all required elements of this training could affect officer interactions with certain communities and cultures.

## Compliance with generally accepted government auditing standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with generally accepted government auditing standards as published in *Government Auditing Standards* (July 2018 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## The mission of the Office of the Washington State Auditor

Our mission is to promote accountability and transparency in government. We work with state agencies, local governments and the public to achieve our vision of increasing public trust in government by helping governments work better and deliver higher value. The results of our work are widely distributed through a variety of reports, which are available on our website and through our free, electronic [subscription service](#). We take our role as partners in accountability seriously. We provide training and technical assistance to governments and have an extensive quality assurance program. For more information about the State Auditor's Office, visit [www.sao.wa.gov](http://www.sao.wa.gov).

# Appendix B: Objectives, Scope and Methodology

## Objectives

The purpose of this performance audit was to examine the progress made by the Criminal Justice Training Commission and law enforcement officers on training required by the Law Enforcement Training and Community Safety Act. It determined the reasons for noncompliance and other barriers, and risks for officers and communities when training has not been completed. It also considered what the commission can do to increase compliance with the training law before the deadline. The audit addressed the following objective:

- What progress have the Criminal Justice Training Commission and law enforcement officers made on training as required by the Law Enforcement Training and Community Safety Act?

For reporting purposes, we organized the audit results into three key findings. The messages relate to the original objective as follows:

- While the commission has developed most required trainings, a more systematic approach would help future training development (pages 12-18) – This addresses the commission’s progress on training.
- The law requires compliance, but most officers did not make sufficient progress and the commission lacks effective tools to get participation (pages 19-29) – This addresses law enforcement officers’ progress on training and reasons for noncompliance.
- Lack of necessary data about officers’ progress with required training makes it difficult to see whether legal intent is being met (pages 30-36) – This addresses law enforcement officers’ progress on training, reasons for noncompliance and effect of noncompliance.

## Scope

This audit examined progress made by the commission and police officers in meeting training requirements set out in state law and commission regulations, listed in **Figure 1** (on the following page). As in the body of this report, we refer to the continuing training described in the Law Enforcement Training and Community Safety Act, which focuses on violence de-escalation and mental health training, as the *required 40-hour training*. The training incorporates 24 hours of patrol tactics and 16 hours of community and cultural awareness courses.

Figure 1 – State laws and rules regarding violence de-escalation and mental health training

State law or rule	Title and description
RCW 43.101.450	<b>Violence de-escalation training.</b> Requires officers to take training. Requires the commission to report on compliance by agencies and officers to legislature and governor.
RCW 43.101.452	<b>Mental health training.</b> Requires officers to take training.
RCW 43.101.455	<b>Violence de-escalation and mental health training—Adoption of rules—Training requirements.</b> Requires the commission to adopt annual hour requirements and curriculum for basic and continuing violence de-escalation and mental health training. Requires the commission to establish the means by which officers will receive trainings.
WAC 139-11-020(2)	<b>Requirements of training for law enforcement.</b> Establishes hour requirement and topics for continuing mental health and violence de-escalation training.
WAC 139-11-050	<b>Community input.</b> Establishes commission’s annual summit and annual report.
WAC 139-11-060	<b>Miscellaneous.</b> Establishes commission’s responsibility to retain training records submitted by law enforcement agencies.

## Commission’s progress on developing this required continuing training

We examined the commission’s progress on developing courses for the 40-hour training program from the beginning of the program in 2019 through October 2025. We did not evaluate the commission’s work on initial training officers take within Basic Law Enforcement Academy (basic academy) because the commission contracted with International Association of Directors of Law Enforcement Standards and Training to examine the initial training curriculum to determine whether it met legal requirements.

## Officers’ progress on taking continuing training

Auditors analyzed officers’ progress on training by reviewing the commission’s training data exported from the commission’s learning management system, Acadis, concerning all Washington-certified “peace officers” who are required to take the training. State law requires this training for all “general authority peace officers,” such as those employed at police departments, sheriff’s offices and state agencies like the Washington State Patrol. The training requirement also applies to some “limited authority peace officers” such as those at the State Liquor and Cannabis Board. For this report, we use the more general term “police” to refer to all such required officers. We used training data from the initiative’s approval date of June 2018 through May 2025.

The audit also specifically looked at barriers to compliance, risks of noncompliance to officers and communities, and ways the commission can increase compliance with training requirements. Although we did speak with a number of law enforcement agency training managers to learn about their experiences with training, the agencies were not our auditees so we did not look at ways they could increase compliance.

## Office of Independent Investigations

The Law Enforcement Training and Community Safety Act also established the Office of Independent Investigations to investigate officer use of deadly force incidents. This audit did not look at independent investigations.

## Methodology

We obtained the evidence used to support the findings, conclusions and recommendations in this audit report during our fieldwork period (April through October 2025). We summarized the work we performed to address the audit objective in the following sections.

### **Objective: What progress have the Criminal Justice Training Commission and law enforcement officers made on training as required by the Law Enforcement Training and Community Safety Act?**

To answer this question, we addressed each aspect of the objective separately:

- A. What progress has the commission made on developing the required curriculum?
- B. What progress have officers made on taking the required training?

#### ***A. What progress has the commission made on developing violence de-escalation and mental health training curriculum?***

We wanted to determine how many of the legally required topics for continuing training were present in the trainings. We analyzed the legal requirements in state law and rules for the curriculum and identified 46 separate topics listed in WAC 139-11-020 that must be included in the commission's trainings.

We then obtained course materials from the commission and conducted a qualitative analysis comparing training materials to legal requirements to determine the commission's progress on creating required training.

We also conducted interviews with commission staff and online research to better understand:

- The training program structure and processes
- Available courses that count toward required hours
- Curriculum review processes
- Possible causes for undeveloped courses

Finally, we interviewed two representatives from community groups that were involved in I-940 to better understand the intent behind sections of law and rule.

We also researched best practices for project management to identify criteria for project management.

## ***B. What progress have officers made on taking the required training?***

To address this part of the objective, we requested officers' training data from the commission's Acadis learning management system.

### **Conducted data reliability testing of the commission's training data**

To confirm the dataset we received from the commission contained all certified police officers and all law enforcement agencies that are required to comply with the law, we compared the data to data supplied by the Washington Association of Sheriffs and Police Chiefs. We found the total number of officers and agencies differed by less than 1% and thus presented no concerns around reliability.

To confirm we received data on all training courses that fulfill the training requirements, we reviewed previous commission reports, its website and interviewed staff to identify the 17 training courses that count toward the 40-hour training requirement (listed in Exhibit 10 on page 35). All 17 courses were present in the data.

For these reasons, we concluded that training data from the commission's Acadis training management system was sufficiently reliable to answer our audit question.

### **Analyzed this data to quantify officers' progress toward training deadlines**

We conducted a quantitative data analysis of commission's training data to determine officers' progress on taking training. Specifics of our analysis are provided below.

#### *Types of officers*

There are about 11,000 law enforcement officers in Washington state. Because officers have different due dates to complete training based on when they graduated from basic academy and received their initial certification, we separated them into different groups of officers (the data is as of May 31, 2025):

- Veteran (or "incumbent") who graduated from basic academy prior to May 2020. These 7,410 officers must complete their first cycle of a minimum of 40 hours of continuing training by January 1, 2028.
- New officers who graduated from basic academy from May 2020 through May 2022. These 995 officers must complete their first cycle of a minimum of 40 hours of continuing training three years after their individual graduation dates.

We did not analyze data for 2,602 "very new" officers who graduated from basic academy after May 2022. We excluded them from our analysis because they did not yet have three years of records for us to determine their compliance.

#### *Analysis of training completion*

For veteran officers, we determined for each of the 17 training courses whether each officer completed the course on or before May 31, 2025. For new officers, we determined for each of the 17 training courses whether an officer completed the course within three years of certification. For both groups, we only counted each training course one time, even if taken multiple times, except for the two-hour Annual Crisis Intervention Training course which counts a maximum of three times in a three-year cycle for a total of six hours.

This allowed us to determine officers' training progress for both groups, by seeing how many officers in each group had completed 40 hours or more of training required by the law (full compliance) before their deadline. For those officers who completed less than 40 hours we determined how many completed at least 20 hours and how many completed less than 20 hours.

These results are a snapshot for the officers certified as of May 31, 2025. Each month, the list of certified officers changes as new officers complete basic training and veteran officers retire or otherwise separate from employment.

### **Conducted focus groups to understand reasons for noncompliance with training requirements**

To understand why officers are not taking required training, we conducted two focus groups for training managers at law enforcement agencies around the state. We also wanted to learn about their experiences overseeing training compliance and their interactions with the commission.

We asked the commission to reach out to law enforcement agencies on our behalf, inviting agency training managers to participate in our focus groups and share perspectives with us. The commission contacted staff from the more than 250 police agencies in the state; all were given the opportunity to opt in. We limited participation to one representative from each agency. Because of high interest and limited space in our focus groups, we used Microsoft Forms to send our poll questions and focus group questions to all officers who reached out to us to participate asynchronously.

A total of 28 agency representatives shared perspectives with us, although not all of them participated in the poll that was part of the focus group and included in the Microsoft Forms questionnaire. Some only answered a question when they had the information to share. We did not ask every representative to answer every question. Nine representatives shared their perspectives through written responses.

Focus groups included representatives from 19 agencies, employing about 2,500 (or 23%) of all sworn officers. They held a range of ranks, including: undersheriff, deputy chief, captain, lieutenant, commander, sergeant and civilian (non-sworn). Those in attendance represented state, county, city and university agencies across the entire state.

Having collected all the responses, we conducted qualitative analysis to understand some common reasons for low training compliance rates as well as barriers to training compliance. While the opinions and perspectives we heard cannot be generalized to all officers in the state, they revealed common barriers to officers' compliance with training.

### **Risks of noncompliance.**

To understand the risks to officers and communities if officers do not take all required courses in this training program, we:

- Conducted interviews with commission staff to understand the effect on officers
- Interviewed two representatives of community groups who worked on I-940 to learn about the risks for communities
- Analyzed studies that looked at the impact of violence de-escalation training on communities

## Best practices

To improve officers' compliance with training, we also researched best practices related to program management and identified criteria that the commission can use in its work with officers.

## Work on internal controls

We obtained an understanding of internal controls that are significant to the audit objective and assessed their design to the extent necessary to address our audit objective.

To assess the design of internal controls related to the first sub-objective, we reviewed the commission's approach to developing procedures for required training and its policy manual. Based on our conducted work, we identified the following deficiencies in the design of internal controls:

- The commission does not have a project management plan to guide its training development
- The training policy or training approval forms do not require the staff to review course materials to ensure that WAC requirements are met by training

The commission is currently updating the policy to require the review to determine which WAC requirements are met in each training.

To assess the design of internal controls related to the second sub-objective, we reviewed:

- Methods of communication the commission uses to inform law enforcement agencies about the training program
- The commission's learning management system records, and various reports to the Legislature and governor

Having conducted our work, we identified the following deficiencies in the design of internal controls:

- Though the commission uses various forms of communication, clear program guidance is evidently not reaching agencies. As a result, agency training managers are confused about training requirements.
- The commission's learning management system has records for which training courses officers have taken, and it retains those records. However, the commission does not track whether officers have met the 40-hour training requirement by their deadlines and agencies find the system is difficult to use.



“Our **mission** is to promote accountability and transparency to achieve our **vision** of increased trust in government.

– Pat McCarthy, State Auditor

Washington State Auditor's Office  
P.O. Box 40031 Olympia WA 98504

[www.sao.wa.gov](http://www.sao.wa.gov)

**1-564-999-0950**



Office of the Washington State Auditor  
Pat McCarthy