



**To: Members of the Joint Committee On Transparent Policing
and Use of Force Reform**

From: Jason Myers, Executive Director
Oregon State Sheriffs' Association

Chief Jim Ferraris, President
Oregon Association Chiefs of Police

Date: September 3rd, 2020

Re: Testimony re LC 18 (Law Enforcement Uniforms)

Good afternoon Co-Chairs Bynum and Manning and Members of the Committee,

On behalf of the Oregon Association Chiefs of Police and the Oregon State Sheriffs' Association, please accept this testimony regarding LC 18 (Law Enforcement Uniforms).

As currently drafted, LC 18 would establish requirements for displaying identifying information on peace officer uniforms, would direct law enforcement agencies to consider the effect on officers when changing uniforms or uniform policy, requires agencies to identify and disclose the identify a police officer to the public upon request and directs the Department of Public Safety Standards and Training to assign an identifying number to each police officer certified by department.

We understand that one of the initial objectives of this proposed legislation was to address the use of camouflage uniforms by law enforcement agencies, especially in circumstances where officers are responding to riot, civil commotion, or mob action. We can support legislation that prohibits the use of uniforms that use camouflage for crowd control teams. We can also support prohibiting the use of camouflage for police officer duty uniforms. We believe exceptions should be made for SWAT teams where cover and concealment are purposeful for their assigned tasks and in rural operations where camouflage is necessary based on tactical operations where concealment is required both the safety of the officers and the effectiveness of the operation.

Comments re the provisions of LC 18 as drafted:

- LC 18 would require changes to uniforms for every officer in Oregon in order to accommodate the identification requirements in the measure. Based on the standard for visibility established in the draft, the required size of the identification would be impractical and in some cases impossible to achieve. The lettering required would also not be possible on many uniform types because of their design. Ultimately these uniform requirements would be costly to agencies at a time when local government revenue is plummeting due to COVID-19. There are also no exceptions for class “A” uniforms that are used in ceremonial settings like police officer funerals, recognition events, etc.
- LC 18 prohibits a uniform from being covered or obstructed in any way. No exceptions are identified for OSHA required reflective vests for safety in traffic crash or other roadway settings.
- LC 18 would direct law enforcement agencies to consider the effect on officers when changing uniforms or uniform policy. Currently, police uniforms are carefully designed to address the safety needs of officers including injury causation considerations, comfort, mobility and accessibility of duty tools. This section could create a new subject of collective bargaining and could open agencies up to accommodating specially designed uniforms by officer.
- LC 18 would require an agency to “perform an investigation” when a member of the public requests the agency determine the identify of an officer when they present partial information from a list included in the draft and requires the agency to confirm receipt of the request within 7 days and provide the officer identification or reason why the identification couldn’t be performed within 14 days. We prefer that the legislation include a requirement that agencies have a policy as opposed to including the prescriptive policy outlined in the bill.
- LC 18 would require the Department of Public Safety Standards and Training to assign an identifying number to each police officer certified by department. This provision is unnecessary because DPSST already assigned each officer a unique identifying number.

Thank you for your consideration