

**ATTACHMENT A**

# ANALYSIS OF POLICE OVERSIGHT MODELS FOR THE CITY OF PASADENA

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# ANALYSIS OF POLICE OVERSIGHT MODELS FOR THE CITY OF PASADENA

## EXECUTIVE SUMMARY

In considering whether to establish civilian oversight of the Pasadena Police Department (PPD), the City of Pasadena retained Kathryn Olson and Barbara Attard to:

- Meet with stakeholders to learn about the issues of concern that oversight could address.
- Analyze existing police oversight models, with a focus on those in similarly sized charter cities.
- Identify an approach to oversight they believe will best addresses stakeholder concerns.

This report summarizes Olson and Attard's analysis and findings. The report does not provide an evaluation of the PPD or any police incident, and the recommendations for oversight do not constitute an assessment in this regard.

Themes that emerged from stakeholder interviews include the following:

- Many stakeholders expressed their support of the PPD and their belief that PPD is doing an effective job of policing.
- Other stakeholders related negative personal experiences with PPD or expressed their opinion that PPD officers do not treat communities of color fairly.
- These differences in viewpoints are echoed in the recent *Community Perceptions of Policing in Pasadena* survey.
- Many stakeholders, including those who had highly favorable opinions of the PPD, believe that civilian oversight could enhance community-police trust.

Every oversight entity is unique, combining various and different functions to provide police accountability and transparency. This is true of the twenty-three oversight bodies reviewed by the Consultants for this project. Based on Pasadena stakeholder meetings and an analysis of these existing oversight entities, the Consultants recommend that Pasadena consider:

- A blended civilian oversight model, incorporating the Independent Police Auditor (IAP) and Police Accountability Commission (PAC) approaches.
- The IAP would provide the expertise of a professional and independent auditor with extensive experience in examining public safety practices.
- The PAC would bring significant value by acting as a liaison between the PPD and the community, helping PPD better appreciate community concerns and

helping the community better understand the work of PPD.

A similar oversight model currently is being piloted in Anaheim. Should Pasadena adopt the recommendations contained herein, Anaheim's experience could provide helpful information regarding structural and procedural details of this two-part model of oversight.

The Consultants commend the City of Pasadena for engaging in a considered approach to evaluating oversight and involving all stakeholders in the process. The City has taken an important first step to ensuring that any police oversight model adopted meets the needs of the Pasadena community.

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# ANALYSIS OF POLICE OVERSIGHT MODELS FOR THE CITY OF PASADENA

## I. INTRODUCTION

The City of Pasadena is considering whether to establish civilian oversight of the Pasadena Police Department (“PPD” or “the Department”). Pasadena engaged Kathryn Olson, Change Integration Consulting, LLC and Barbara Attard, Accountability Associates (“Olson and Attard” or “the Consultants”), to interview stakeholders to assess the particular issues for which oversight is intended to address, to prepare an analysis of existing police oversight models, and to identify the oversight model that best addresses stakeholder concerns. This report summarizes themes in stakeholder interviews, provides an overview of the structure and authority of various oversight agencies, and highlights the oversight model functions that might best suit Pasadena stakeholders.

In considering whether to adopt oversight and selecting the approach most likely to be successful, the interests of the community, elected officials, government administrators, and police commanders and officers must be considered. Unfortunately, civilian oversight often is established in the immediate aftermath of an emotionally charged police incident, without sufficient attention to oversight structure, powers and processes, or consideration as to how oversight will fit into other accountability systems in place. In taking the time and effort to thoroughly consider oversight options, and engaging stakeholders in an exchange about the strengths and weaknesses of various oversight approaches, the City of Pasadena helps ensure that any police oversight model adopted is realistic, has well-defined objectives, is appropriately resourced, and strikes a balance among the competing interests involved.<sup>1</sup>

The Consultants were not engaged to assess any particular PPD incident, and have not conducted an audit of PPD policies and practices. The focus of the project was on how oversight could improve police-community relations in Pasadena; the recommendations do not reflect an evaluation of the Department, specific incidents, or individual PPD officers. .

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<sup>1</sup> Farrow, Joe and Trac Pham. *Citizen Oversight of Law Enforcement: Challenge and Opportunity*; The Police Chief, Vol 70, No.10 (October 2003).



## II. CIVILIAN OVERSIGHT OVERVIEW

Civilian oversight of law enforcement in the United States is an evolving governmental function designed to provide the community with a means to influence police practices and help ensure that law enforcement is conducted in a manner that is constitutional, effective, and responsive to the standards, values, and needs of those served. Oversight may be established in response to recurring law enforcement issues, or developed proactively to enhance police-community relations.

Oversight has become an integral part of municipal administrations in most large cities in the U.S., with some smaller cities, counties, and states also developing mechanisms for community members to weigh in on police matters. The National Association for Civilian Oversight of Law Enforcement (NACOLE) lists and provides links to approximately 135 oversight agencies throughout the U.S., along with detailed profiles of a sample group of those organizations on its resource page.<sup>2</sup>

Civilian oversight organizations in the U.S. include a variety of different structures or models, such as commissions, boards, inspector generals, auditors, monitors, and investigative agencies. Whether an oversight body is labeled a “commission,” “board,” “auditor,” or any other term, it could have authority to function in any or all of these different capacities:

- Accepting and referring police misconduct complaints
- Investigating police misconduct complaints
- Monitoring or auditing a police department’s internal investigations and findings
- Conducting reviews of patterns of misconduct
- Rolling out to critical incidents
- Conducting hearings and making decisions on police discipline matters
- Making recommendations for improving police policy, practices, and training
- Reporting on oversight and its impact on policing
- Fostering community education and engagement about policing and oversight
- Facilitating alternative dispute resolution or community reconciliation

Most oversight organizations are multifaceted and work to improve policing and police-community relations in a variety of different ways. As communities learn more about policing and oversight, and needs change, the authority of an agency may evolve, leading

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<sup>2</sup> See, <http://nacole.org/resources/police-oversight-jurisdiction-usa> According to current NACOLE President Brian Buchner, the list is non-exhaustive and there are currently more than 200 oversight entities in the U.S. NACOLE is in the process of updating its directory of oversight agencies.

to the creation of new oversight powers to complement or replace the work of the existing organization.<sup>3</sup>

### III. PROJECT APPROACH – 3 PHASES

Olson and Attard approached this project in three phases:

**Phase 1** provided an opportunity for the Consultants to meet with Pasadena stakeholders to share information about civilian oversight, learn about and discuss concerns raised about policing issues, and begin a dialog about how oversight would address such issues. Meetings and interviews were held in Pasadena January 26-28, 2016, with a goal to elicit input about policing and oversight from a wide sample of perspectives.

The Consultants used a PowerPoint presentation during larger meetings and reviewed the information during one-on-one interviews or in small group meetings. See attached copy of the PowerPoint, Appendix A. In all settings, the Consultants provided information about their backgrounds, reviewed general information about police oversight functions, invited stakeholder input about experiences with the PPD, and discussed how oversight could address the concerns raised.

Meetings were held with the following individuals and groups:

- General community – members of the Pasadena community were invited to attend a meeting held in City Council chambers. Approximately 30 people attended.
- Northwest Commission – members of the Pasadena community were invited to attend a meeting sponsored by the Northwest Commission held at the Jackie Robinson Center. Approximately 50 people attended.
- Coalition for Civilian Oversight of Pasadena Police (CICOPP) – CICOPP arranged a meeting with coalition members, with approximately 20 people in attendance. Prior to meeting, CICOPP provided the Consultants (and others in Pasadena) with a draft resolution proposing that the Pasadena City Council authorize creation of an Independent Police Auditor. Specifics relating to the Resolution were discussed, along with broader policing and oversight concerns.
- Mayor and Members of the City Council – individual meetings were conducted with Mayor Terry Tomek and each member of the Council: Victor Gordo, Tyron Hampton, John J. Kennedy, Steve Madison, Gene Masuda, Margaret McAustin, and Andy Wilson.
- City Manager Michael J. Beck (who has since left his position with Pasadena) and (now) Acting City Manager Steve Mermell.
- Pasadena Police Department Chief Phillip J. Sanchez and members of his Command

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<sup>3</sup> Attard, Barbara and Kathryn Olson. *Overview of Civilian Oversight of Law Enforcement in the United States*; [nacole.org/wp-content/uploads/Oversight-in-the-United-States-Attard-and-Olson-2013.pdf](http://nacole.org/wp-content/uploads/Oversight-in-the-United-States-Attard-and-Olson-2013.pdf) (2013).

Staff.

- Pasadena Police Officers Association and Pasadena Police Sergeants Association representatives (the two associations were in the process of merging at the time).

In addition to the meetings and interviews noted above, input about policing in Pasadena and oversight was solicited through a special Web portal created on the City's website. The portal address was announced at all group meetings and submissions could be made anonymously, if desired. The website portal remained open until April 6, 2016, and 15 submissions were received.

The Consultants also solicited input from Pasadena Neighborhood Association representatives. An email summarizing the purpose of the project and asking for input, along with a copy of the PowerPoint presentation, was sent to 64 Neighborhood Associations. This resulted in feedback from several representatives, by email or through the website portal.

In addition to the draft Resolution that was provided by CICOPP, and a summary of highlights of the Resolution, the Consultants reviewed other documents, including:

- Police Assessment Resource Center and Vera Institute of Justice. *Pasadena Police-Community Relations Assessment*. 2006 ("2006 PARC/Vera Institute study").
- Police Assessment Resource Center. *Evaluation of a Pilot Community Policing Program: The Pasadena Police-Community Mediation and Dialog Program*. COPS Evaluation Brief No. 2. Washington, D.C.: Office of Community Oriented Policing Services, U.S. Department of Justice, 2008.
- *Report to the City of Pasadena Concerning the Officer-Involved Shooting of Leroy Barnes, Jr.*, OIR Group, October 2009.
- Results of a 2011 informal survey of 600 residents and visitors regarding police practices in NW Pasadena, conducted by Kris Ockershauser and Michelle White.
- Memorandum from Michelle White and Kris Ockershauser to Pasadena Public Safety Committee re: Pasadena's Police Department and its relations with Northwest Pasadena residents, March 11, 2013.
- *Pasadena Police Department: Performance Audit of Detective Operations*, Veritas Assurance Group, Inc., December 8, 2014.
- *Report to the City of Pasadena Concerning the Officer-Involved Shooting of Kendrec McDade*, OIR Group, August 2014 (redacted copy publically released November 2015).
- Graziano, Lisa M., Ph.D. *Community Perceptions of Policing in Pasadena*, February 2016, (in part, replicating PARC's 2006 study). (*Community Perceptions of Policing in Pasadena*”).

Olson and Attard also reviewed information available on the Police Department's website and documents received from the PPD, including statistical reports on misconduct complaints and use of force by PPD officers for the years 2012 through 2015.

The above reports and memos were considered as background material only. The review conducted for this report was not intended as an assessment or validation of prior studies.

**Phase 2** involved researching and preparing an analysis of various forms of established police oversight, particularly in California, with an emphasis on cities and police departments of the approximate size and same governance structure as in Pasadena. For each oversight agency included in the analysis, information was gathered regarding the major characteristics of the entity reviewed, its scope of authority and governance structures, and such issues as:

- How and by whom members of the oversight entity are selected/appointed.
- What, if any, role does the oversight entity have in the citizen complaint process.
- Whether the oversight entity serves as an appeals board for citizen complaints and/or officer discipline.
- To what extent the oversight entity reviews departmental policy.
- To whom the oversight body reports/interfaces, e.g., Mayor, City Council, City Manager, Police Chief.
- Estimated annual cost of such oversight.
- An assessment of the pros and cons of such models in terms of access to information such as personnel files, case files, the ability to influence policy and the ability to share information publically as well as other relevant factors.<sup>4</sup>

Of the 33 oversight agencies in California listed on the NACOLE website, 16 are located in charter cities, with a governmental structure similar to that of Pasadena.<sup>5</sup> Though many of these oversight agencies are in cities much larger or smaller than Pasadena, the Consultants researched the structure and authority of 15 out of the 16 entities.<sup>6</sup> To provide a broader sampling of oversight in operation, they also reviewed oversight entities in Burbank, a California charter city that was not on NACOLE's list, three non-charter jurisdictions in California (Claremont, Davis and Novato), and four cities outside the state (Albany, Denver, Eugene, and Philadelphia). Information about the characteristics of these oversight agencies is summarized below. A chart summarizing information about the 23 oversight entities included in this study is attached as Appendix B.

**Phase 3** of the project entailed writing this report and presenting it to the Pasadena City Council on April 18, 2016. In addition to summarizing stakeholder input and providing detail about oversight approaches used in other jurisdictions, the Consultants outline their

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<sup>4</sup> The specific characteristics to be included in the analysis were detailed in the Request for Proposals – Analysis of Police Oversight Models for the City of Pasadena.

<sup>5</sup> See FN 3 for the NACOLE list of oversight agencies. For a list of charter cities in California, see [http://www.cacities.org/Resources-Documents/Resources-Section/Charter-Cities/Charter\\_Cities-List](http://www.cacities.org/Resources-Documents/Resources-Section/Charter-Cities/Charter_Cities-List)

<sup>6</sup> Tulare, CA is a charter city included on NACOLE's list as having oversight through the Police Department Citizen Complaint Review Board (CCRB). However, the Consultant's were unable to make contact with a representative of Tulare or the CCRB to better understand CCRB's structure and authority. Thus, the CCRB is not included in this analysis.

recommendations in Section VI below, as to the model and functions of police oversight that will best address the most common concerns raised by stakeholders.

#### IV. THEMES IN STAKEHOLDER TESTIMONY

Involving stakeholders in the assessment of oversight options is key to inspiring confidence in the process and final outcome, and contributes to police accountability, transparency, and legitimacy. A primary goal of this project was to make explicit the experiences and insights of those who will be affected by the decision of the City of Pasadena concerning police oversight.

Stakeholder outreach provided a high level and wide variety of perspectives about policing in Pasadena. A significant number of community members, civic leaders, police officials, and association representatives met with the Consultants or shared their opinions through the Web portal or via email. It quickly became apparent that there are stark divisions between community stakeholders on all levels regarding their perceptions of policing in Pasadena and the need (or lack thereof) for oversight.

Community members of color and their representatives often reported feeling under siege in their neighborhoods and alienated from the PPD, and strongly recommended independent oversight. In distinct contrast, those from other areas of the city for the most part stated unwaveringly that Pasadena did not have issues with policing, and that they believed the call for oversight has been orchestrated by a small number of people overreacting to isolated use of force incidents by PPD and high-profile issues of police misconduct outside of Pasadena.

##### A. Support for the Pasadena Police Department

Stakeholders who expressed support of and confidence in the work of the PPD echoed a theme from the 2006 PARC/Vera Institute study and the *Community Perceptions of Policing in Pasadena* survey conducted in 2015. The survey notes, “As in 2006, in looking across the various domains of police performance, a majority of residents regarded the Pasadena police favorably in 2015, expressing trust and confidence in them, and positively rating their effectiveness and contacts with the police.”<sup>7</sup>

Many stakeholders communicated to the Consultants that they support and respect the police and believe that the Pasadena Police Department is doing an excellent job. Examples of supportive comments include the following:

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<sup>7</sup> *Community Perceptions of Policing in Pasadena*, p. 3.

- The Chief of Police has high expectations for his officers.
- The PPD investigates all complaints, tracks all use of force incidents, disciplines appropriately, and does not tolerate misconduct.
- PPD is diverse and trains officers in sensitivity.
- Policing is different in Northwest Pasadena because there is more crime there.

#### B. Testimony Against Oversight

*“Oversight may be a solution in search of a problem.”* A message relayed by several Pasadena residents.

Many testified during stakeholder outreach meetings that they believe the quest for oversight is being instigated by a small group of activists that do not represent the City of Pasadena. They feel that much of the call for oversight in Pasadena is in response to two incidents, the shootings of Leroy Barnes, Jr. in 2009 and Kendrec McDade in 2012, and high-profile police misconduct on the national level, not ongoing problems with the PPD. They would like to see hard data demonstrating that such a program is warranted, and questioned whether there are benchmarks or established indicators to determine when oversight is needed.

A recurring theme was that there is ample oversight of the PPD by the City Manager, the City Council, and the Public Safety Committee (PSC). Some opined that the PSC already reviews statistical data on misconduct complaints and use of force by the PPD and the authority of this established oversight should not be usurped by another layer of review.

Examples of other statements against oversight were:

- Money is tight in Pasadena and should be spent on mitigating crime, homeless issues, and officer training – particularly training to handle mental health issues.
- Non-law enforcement and untrained people should not have authority over trained law enforcement.
- Members of oversight boards can be politicized.
- The talk of oversight is causing low morale in PPD.

#### C. General Concerns about the Pasadena Police Department

A significant segment of stakeholders related negative personal experiences with the PPD or expressed a general opinion that PPD officers did not treat communities of color fairly. Similarly, the *Community Perceptions of Policing in Pasadena* survey found that, despite general confidence in the PPD, almost half of Pasadena residents believe that the Police

Department is more likely to treat whites and the wealthy better than minorities and the poor.<sup>8</sup> The survey also noted that African Americans and Latinos had more negative perceptions of PPD legitimacy. “As a higher proportion of African Americans and Latinos live in the Northwest Service Area, it is unsurprising Northwest residents generally had more negative views of police legitimacy and discriminatory practices, although Central Pasadena residents also perceived the PPD’s legitimacy less favorably.”<sup>9</sup> The 2015 survey observation that African American and Latinos have more negative perceptions of PPD legitimacy is consistent with findings on the national level. For example, a 2014 Pew Research Center study determined that just 36% of Blacks expressed a great deal or fair amount of confidence in local police to treat Blacks and Whites equally.<sup>10</sup>

Testimony from Latino and African American community members in meetings with the Consultants consistently relayed their perception that policing in their neighborhoods is qualitatively different than in other parts of Pasadena, there is a lack of community policing, and the PPD is out of step with these communities. Some residents expressed feelings of alienation from the PPD and questioned the integrity of the Department. They mentioned a code of silence in the Department, referred to an apparent lack of respect for communities of color, and believe some officers act as though they are above the law.

Other issues raised regarding the PPD include:

- There is racial profiling, selective enforcement, and excessive force.
- The police-in-schools program criminalizes youth.
- When community members raise issues about the PPD, they are not being heard.
- The complaint process is not fair or useful, aggrieved parties are required to speak to a sergeant, filing puts people at risk of retaliation, and complaints go unanswered.
- Police should have better training in de-escalation of force.
- There is a need for more Spanish speaking officers.
- Police should be taught sensitivity in handling domestic violence calls.
- PPD uses tactics like parking a police car in the middle of a neighborhood park, with no communication to the residents about the purpose.

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<sup>8</sup> *Community Perceptions of Policing in Pasadena*, p. 1.

<sup>9</sup> *Ibid.*

<sup>10</sup> <http://www.pewresearch.org/fact-tank/2015/04/28/blacks-whites-police/> The report notes that the differences are long standing, as the gaps were similarly wide when the question was asked in 2009 and 2007.

#### D. Testimony in Favor of Oversight

*“Oversight can make a good department great.”* A comment registered on the City’s Web portal.

Those who call for oversight of the PPD see it as providing a bridge between the police and the community, feel that oversight is a way to restore trust and legitimacy in the PPD, and a means to build consensus in the City. A recurring theme was that oversight is needed to enhance communication between the PPD and the community, and that outreach, transparency, and accessibility are also important.

The one specific “model” of oversight that was recommended by stakeholders called for an independent auditor who can balance confidentiality constraints with public reporting to facilitate accountability and transparency. This approach is also responsive to those who feel that only trained professionals should be evaluating police.

There also was significant interest in having a representative board from the community involved in oversight. Some felt that a board or commission should supplement the work of an independent auditor.

Other oversight-related comments include:

- Oversight must be independent (from the PPD and the governing structure).
- To gain the confidence of the community, oversight must have ample authority to impact positive change in the PPD.
- Oversight should have the ability to impact police policies and practices.
- The mediation program should be restored.
- Oversight should have authority to investigate misconduct complaints and discipline the police.

As stated in the introduction to this section, there is a wide divide in the perspectives brought forward regarding policing and oversight in Pasadena. However, even stakeholders who themselves have never experienced a problem with the PPD believe that communities of color are policed differently. Though there is not “hard data” to support these perceptions, most stakeholders agree that there are issues that must be addressed, and many see civilian oversight as providing an answer.



## V. STRUCTURE AND AUTHORITY OF OVERSIGHT AGENCIES IN CALIFORNIA CHARTER CITIES, ELSEWHERE IN CALIFORNIA, AND IN OTHER STATES

A chart summarizing the major characteristics of each of the twenty-three oversight entities included in this study is attached. The Consultants focused on California charter cities with police oversight, but also included non-charter cities in California and a sampling of jurisdictions outside of the state.

It again should be stressed that no two oversight entities are identical, even if they share the same name, such as “commission” or “police auditor.” There is great variation with regards to the range of oversight functions performed and on each of the seven specific structure/authority factors reviewed by the Consultants. Examples of oversight approaches are provided in the discussion below, particularly those in charter cities, while full details on all entities in this study can be found in the appendix.

### A. Functions performed by oversight agencies

Of the 19 oversight entities in California jurisdictions (16 charter cities and three non-charter) reviewed, six have primary authority to investigate police misconduct complaints, including entities in Berkeley, Long Beach, Oakland, Richmond, Riverside, and San Francisco. Twelve other municipalities have oversight focused on monitoring or auditing a police department’s internal affairs investigations and findings, rather than conducting independent investigations; e.g., oversight of police departments in Anaheim, Burbank, Claremont, Davis, Fresno, Inglewood, Los Angeles, Palo Alto, Sacramento, San Diego, San Jose, and Santa Cruz.

As discussed below, whether primarily tasked with investigating complaints or monitoring investigations conducted by internal affairs, some entities focus on certain types of allegations, such as misuse of force or racial discrimination, and there can be an overlap in duties. For example, the Independent Police Auditor in Santa Cruz is focused on a monitoring function, but he can sit in on witness interviews, provide feedback on a Santa Cruz PD Internal Affairs investigation as it is in progress, and request further investigation or conduct an investigation himself. The primary focus of the Los Angeles Office of the Inspector General (LA OIG) is overseeing the investigations of officer-

### Oversight Agencies Studied

#### California Charter Cities:

- Anaheim
- Berkeley
- Burbank
- Fresno
- Inglewood
- Los Angeles
- Long Beach
- Oakland
- Richmond
- Riverside
- Palo Alto
- Sacramento
- San Diego
- San Francisco
- San Jose
- Santa Cruz

#### Non-Charter Cities:

- Claremont
- Davis
- Novato

#### Cities in other States:

- Albany, NY
- Denver, CO
- Eugene, OR
- Philadelphia, PA

involved shootings and serious use of force incidents. While the LA OIG may open a review or investigation of any event or police practice, individual misconduct investigations are referred to Internal Affairs.

Whether an oversight entity has authority to investigate or monitor complaints, all have authority to make recommendations for improving police policies and practices, except in Inglewood. The discussion in Section E below illustrates the variety of approaches taken to the policy review function.

Most, though not all, of the oversight entities reviewed by the Consultants issue regular reports on misconduct complaint trends, policy recommendations, controversial local police incidents, and other topics related to oversight and policing. In addition, or in place of reports, some entities post information on their websites, and all work to educate the community about policing matters and encourage engagement through public meetings and other outreach efforts. Due to legal confidentiality constraints, oversight agencies in California do not identify in their reports the specific subject officers involved.

#### B. How and by whom members of the oversight entity are selected/appointed

Individuals involved in oversight entities are selected or appointed in a variety of ways. For example, in the California charter cities researched by the Consultants, the San Diego Mayor appoints members of the Citizens Review Board on Police Practices, members of the Riverside Community Police Review Commission are appointed by the City Council, and the Independent Police Auditor in Santa Cruz is hired by the City Manager. The Independent Police Auditor in San Jose is one of five Council-appointees and reports to the Mayor and City Council. The Mayor of Oakland nominates members of the Citizens' Police Review Board who then are confirmed by the City Council, while the Richmond Mayor nominates members of the Police Commission after conferring with the City Council.

Anaheim and Fresno, two other California charter cities reviewed, use yet other selection approaches. Anaheim follows a unique lottery system to select nine residents for its Public Safety Board, along with four members appointed by the City Council representing different neighborhoods, and one other person selected at large. Inglewood's Citizen Police Oversight Commission has 11 members, with two selected by the Mayor, two chosen for each City Council district, and one person selected by the Police Chief. Fresno's Police Auditor is hired by the City Manager with input from the Mayor, Police Chief, City Counsel, Police Officers Association, and two members of the Fresno community.

Jurisdictions that have both volunteer members of a commission or board and paid staff may have a different selection process for the different roles. For example, the Berkeley Mayor and City Council appoint the nine members of the Police Review Commission (PRC), while the City Manager hires the PRC Officer (with some input from the Commissioners), who then hires other staff. The Long Beach Citizen Police Complaint Commission has 11 members appointed by the Mayor and confirmed by City Council, with one person from each Council district and two at large. However, the City Manager appoints the Executive Director and Independent Investigators.

Contract independent police auditors provide oversight in six of the 19 California cities in this review: Anaheim, Burbank, Davis, Fresno, Palo Alto, and Santa Cruz.<sup>11</sup> In several jurisdictions, the individual selected as the police auditor had been retained to audit a single incident, such as a controversial shooting, but later contracted with the municipality to provide on-going auditing services of a wider scope. The auditor in these jurisdictions may bring in additional staff to assist as needed. For example, the Fresno Independent Reviewer has recently hired an Assistant Auditor. In contrast, the San Jose Office of Independent Police Auditor has five full-time staff, in addition to the Auditor.

In San Francisco, the Police Commission oversees both the Police Department and the Office of Citizen Complaints (OCC). The Police Commission is comprised of a combination of Mayoral and Board of Supervisors appointees. The Police Commission nominates the Director of the OCC to be appointed by the Mayor and confirmed by the Board of Supervisors.

### C. What role does the oversight entity have in the citizen complaint process?

Oversight entities serve a wide range of roles in the citizen complaint process, from accepting and referring complaints for an internal affairs investigation, to investigating complaints and making findings, to monitoring or auditing in real time or after an investigation is completed, to handling appeals of misconduct findings, as well as a combination of these functions.

Examples of jurisdictions where the work of oversight involves independent investigations and hearings include Oakland, Berkeley and San Francisco. Oakland's Citizens' Police Review Board (CPRB) staff conducts investigations and the CPRB holds evidentiary hearings on complaints and recommends findings and discipline to the City Manager; the Berkeley Police Review Commission has a similar process. The San Francisco Office of Citizen Complaints (OCC) has sole authority to investigate

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<sup>11</sup> Other California jurisdictions also use a contract independent police auditor, including Oxnard, Santa Maria, and Westminster.

community complaints and make findings, and OCC attorneys present the cases in hearings before the Police Chief or the Police Commission for discipline.

Many cities have oversight programs that monitor or audit misconduct investigations investigated by Internal Affairs, e.g. Anaheim's Police Review Board refers complaints for investigation and the City's External Auditor monitors critical incidents and ongoing IA investigations in real time. Similarly, the San Jose Independent Police Auditor (IPA) receives complaints and registers them in the San Jose PD Internal Affairs database, monitors the investigations, can sit in on officer interviews, and audits the final investigation report. Claremont has established a Police Review Ad Hoc Committee of its Police Commission with authority to review all formal complaint investigations for thoroughness and make recommendations to the Police Chief.

**D. Whether the oversight entity serves as an appeals board for citizen complaints and/or officer discipline**

Of the oversight entities researched, three have a process in place for complainants and/or officers to appeal complaint findings. The Richmond Police Commission hears appeals of cases involving allegations of use of force or racial abuse that were investigated by the Professional Standards unit; the San Francisco OCC has a process whereby complainants or officers can appeal for a hearing before a hearing officer within ten days of receipt of a findings letter; and, complainants can request an appeal to the City Manager of Novato for a closed-session hearing before the Police Advisory and Review Commission.

**E. To what extent the oversight entity reviews departmental policy**

Every oversight entity studied has authority to make recommendations about police department policies and practices, except the Inglewood Citizen Police Oversight Commission. Some jurisdictions define the parameters to guide such recommendations. For example, the Citizens Police Review Board in Albany, New York makes recommendations to the City Council and Mayor that are relevant to the goal of community policing and the exercise of discretionary authority. San Diego's Citizens Review Board on Police Practices makes recommendations to the Police Chief and Mayor with the goal to promote fair, humane policing and ensure the safety of citizens and the police. The Richmond Police Commission reviews policies, practices and procedures to promote police/community relations. In addition to setting out the overarching goal of oversight recommendations, Richmond also mandates the process by which recommendations will be considered: the Richmond Police Chief must respond to a recommendation within 30 days; if the Police Commission is dissatisfied with the Chief's response, it can submit the recommendation to the City Manager within 30 days;

the City Manager then has 30 days to respond; and, if the Commission continues to be dissatisfied, the matter is submitted to City Council for final action.

In some jurisdictions the policy development process is collaborative, e.g., the Anaheim External Auditor collaborates with the Public Safety Board to make recommendations on police department practices, procedures, training, equipment, and potential reforms; and the Denver Office of the Independent Monitor works in conjunction with the Citizen Oversight Board to make recommendations regarding discipline, use of force, and other policies, as well as hiring, training, community relations, and the complaint process.

The San Francisco OCC and the Los Angeles Office of the Inspector General have staff dedicated primarily to policy development. These agencies, as well as the San Jose Independent Police Auditor, present policy recommendations in annual or periodic reports for adoption by their Police Commissions (or the City Council in San Jose).

Riverside's Community Police Review Commission's recommendations about department policies, practices, tactics, and training relate to their review of Internal Affairs investigations and officer involved shooting cases. The Commission posts recommendations on its website, along with responses from the Police Department and draft policy changes.

F. To whom the oversight body reports/interfaces, e.g., City Council, City Manager, Police Chief

As with other aspects of oversight authority and structure, there are a variety of approaches in reporting relationships. In California cities that were studied, two oversight entities report to the City Manager (Fresno and Oakland), two report to the City Council (Palo Alto and San Jose), and one reports to the Mayor (San Diego). In Santa Cruz, by contract the Independent Police Auditor reports jointly to the City Manager and City Council, and meets regularly with the Council's Public Safety Committee, a body that in effect evaluates the activities of the Auditor. In Richmond, the Police Chief, City Manager and City Council all have roles in the process. The Berkeley Police Review Commission (PRC) is appointed by and submits reports to the Mayor and City Council, whereas the PRC Officer reports to the City manager, as well as the PRC.

The San Francisco Police Commission oversees the Police Department and the Office of Citizen Complaints; both the Police Chief and the OCC Director attend weekly Police Commission meetings and report on the activities of their respective organizations.

In Riverside, the Community Police Review Commission (CPRC) presents its findings and rationale on misconduct investigations reviewed to the City Manager, who considers

both the CPRC's position and that of the Police Department, and then issues a decision on behalf of the City. CPRC also advises the Mayor and City Council. In Anaheim, the City Manager staffs the Public Safety Board, and the External Auditor also reports to the City Manager.

#### G. Estimated annual cost of oversight

Most oversight boards or commissions in California are comprised of volunteer members, i.e., Anaheim, Berkeley, Claremont, Inglewood, Long Beach, Novato, Oakland, Richmond, Riverside, Novato, Sacramento, San Diego, San Francisco, and San Diego, (although some jurisdictions may provide a small stipend and budget support for training). Typically, jurisdictions with volunteer oversight commissions or boards have paid staff or contract employees to coordinate activities, conduct investigations, handle administrative tasks, and ensure compliance with public meeting and confidentiality requirements, or may share administrative staff with other governmental offices.

Below are estimated costs for oversight entities in California cities studied for this report (note that these estimates do not necessarily include the costs of benefits, where they are offered, and may include unspecified operational costs aside from personnel):

- Anaheim: External Auditor – \$80,000; Public Safety Board – No line budget
- Berkeley: Police Review Commission – \$593,333 (PRC Officer and 2 staff)
- Burbank: Independent Police Auditor – \$80,000
- Claremont: Police Commission – No line budget
- Davis: Independent Police Auditor/Ombudsman – Not to exceed \$60,000
- Fresno: Office of Independent Review – \$80,000; unknown costs for Assistant Auditor and Executive Assistant
- Inglewood: Citizen Police Oversight Commission – \$5000 (training)
- Long Beach: Citizen Police Complaint Commission – \$239,634 (Executive Director and 2 Investigators)
- Los Angeles: Police Commission – Unknown costs included in LAPD budget (Director and support staff)  
Office of Inspector General - \$6,000,000 (IG and staff of 30, and additional unknown costs in LAPD budget)
- Novato: Police Advisory and Review Commission – No line budget
- Oakland: Citizens' Police Review Board – \$1.3 million (Executive Director, Policy Analyst, Office Assistant, 4 Investigators, 3 Intake Technicians)
- Palo Alto: Independent Police Auditor – Not to exceed \$26,000
- Richmond: Police Commission – \$23,000 (Investigative and Appeals Officer)  
Office of Professional Accountability Director - \$165,000

- Riverside: Community Police Review Commission – \$255, 572 (Manager and part-time Administrative Assistant)
- Sacramento: Office of Public Safety Accountability – \$250,000 (Director and staff support from the City Manager’s office)  
Community Police Commission – No line budget (Staffed by Director of OPSA)
- San Diego: Citizens Review Board on Police Practices – \$115,000 (Executive Director and unspecified salary for part-time Executive Assistant)
- San Francisco: Office of Citizen Complaints – \$5,562,000 (Director and 33 staff)  
Police Commission – Approximately \$200,000 (Police Sergeant and Administrative Staff)
- San Jose: Independent Police Auditor – \$1,284,500 (Director and 5 staff)
- Santa Cruz: Independent Police Auditor – \$54,000

H. An assessment of additional aspects of such models in terms of access to information such as personnel files, case files, the ability to share information publically, and other relevant factors

Municipalities have developed oversight programs with a broad range of authorities in response to the needs of stakeholders or to answer a particular concern or issue. Of particular interest in this context is whether agencies have access to personnel information and complaint files, and can make public reports.

As delineated in the attached chart of oversight agencies, Appendix B, most oversight programs have some authority to access police complaint investigation files, which are considered personnel files in California. Investigative agencies have access to confidential information relevant to the investigations they conduct, but may not be able to review investigations of internal complaints conducted by Internal Affairs (IA), as is the case with the Berkeley Police Review Commission and the Oakland Citizens Police Review Board. In both of these agencies, the Commissioners and the oversight practitioners who conduct investigations have access to the investigative files of the oversight agency, but do not have access to IA investigations. Complainants are involved in hearings of the complaints, but do not have access to confidential complaint information regarding officer misconduct.

In assessing discipline for a particular case or in conducting a broader review of discipline systems, early intervention data, or other audits, some oversight authorities may have access to officers’ full personnel records. The Anaheim External Auditor, Los Angeles Board of Police Commissioners and Office of the Inspector General, the Palo Alto Independent Police Auditor, the Director of the Richmond Office of Police Accountability, and Santa Cruz Independent Police Auditor appear to have access to

personnel files if needed. However, the Consultants are informed that some of these entities rarely, if ever, see a need for access to such files.

Due to confidentiality provisions stipulated by California Penal Code Section 832.7, records associated with citizen's complaint investigations are deemed to be part of police officers personnel files and must be kept confidential. Oversight agencies may report aggregate data regarding complaints, but may not release information regarding specific officer misconduct, even if they have access to such files. Again, most oversight agencies issue reports on their activities, including summaries of misconduct complaints they have investigated or reviewed, while respecting Penal Code Section 832.7 confidentiality requirements.

## VI. RECOMMENDED OVERSIGHT MODELS AND FUNCTIONS TO ADDRESS PASADENA STAKEHOLDER CONCERNS

While a majority of stakeholders expressed their respect and support for the Pasadena Police Department, many of the same individuals and others indicated that civilian oversight was needed to remedy real or perceived differences in policing of African American and Latino neighborhoods, particularly in Northwest Pasadena. As noted by the President's Task Force on 21<sup>st</sup> Century Policing, "some form of civilian oversight is important in order to strengthen trust with the community."<sup>12</sup>

Olson and Attard recommend that the City of Pasadena consider adoption of a two-part accountability program consisting of an Independent Police Auditor (IPA) who would provide professional oversight, and a Police Accountability Commission (PAC) that would allow for the involvement of community members with authority to positively influence police matters and enhance communication with the public.<sup>13</sup> These recommendations take into consideration the wide range of perspectives and concerns offered by stakeholders, the research done during Phase 2 of this project on existing oversight entities (particularly in similarly sized California charter cities), and Olson and Attard's combined experience working in the oversight field.

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<sup>12</sup> President's Task Force on 21<sup>st</sup> Century Policing, 2015. *Final Report of the President's Task Force on 21<sup>st</sup> Century Policing*. Washington D.C.: Office of Community Oriented Policing Services; Recommendation 2.8.

<sup>13</sup> Though the Coalition for Civilian Oversight of Pasadena Police (CICOPP) presented a resolution that an IPA model be established, Olson and Attard considered all testimony before arriving at this recommendation. The CICOPP proposal also contemplated an auditor model with duties much broader than recommended here, and would have required extensive staffing and budget resources.



Two California charter cities with auditor/monitor oversight agencies, Sacramento and Anaheim, have recently expanded their programs to include a representative community board. The analysis here focuses on oversight in the City of Anaheim, however, as Sacramento is significantly larger than Pasadena.<sup>14</sup>

#### A. The Anaheim Oversight Program

The approach suggested for Pasadena is similar to what the City of Anaheim began piloting in February 2014.<sup>15</sup> In Anaheim, an External Auditor, the Office of Independent Review Group (OIR), had been providing after-action audits of police incidents, but its role was expanded to include real time monitoring of critical incidents and investigations, including officer involved shootings and other use of force. Along with expanding the scope of the External Auditor's duties, Anaheim created the Public Safety Board (PSB) comprised of nine residents to review fire and police budgets, staffing levels, service delivery mechanisms, police and fire policies and practices, and certain critical incidents, such as officer involved shootings, use of force, and in-custody deaths. The External Auditor and PSB collaborate to develop recommendations to assist public safety in areas that may need improvement. The office of the City Manager is managing the pilot program.

If Pasadena establishes the PAC oversight approach, the Anaheim PSB model is instructive. While the focus presumably would not include fire services, Pasadena could consider the types of issues the Anaheim PSB reviews and determine where structured input from the community regarding the PPD would be useful. The Anaheim PSB has a website that includes information about Board members, time and place of public meetings (held quarterly), agendas and minutes, and directions for filing a complaint. PSB also posts the External Auditor's reports and the response of the Anaheim PD.

#### B. Pasadena Oversight Program: IPA in Conjunction with PAC

A blended oversight program using both an IPA and a PAC in Pasadena would address many of the concerns voiced by stakeholders who advocate for police oversight. While some stakeholders focused on negative experiences with the PPD's complaint investigation system, most raised systemic issues that could be more appropriately explored through an audit program.

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<sup>14</sup> Other cities outside of California reviewed for this report that have oversight programs including an auditor/monitor function and a board or commission are in Denver and Eugene.

<sup>15</sup> See the Anaheim Council Agenda Report, <http://anaheim.net/DocumentCenter/Home/View/3792>

➤ Independent Police Auditor

Developing an IPA oversight model with authority to conduct complaint and critical incident investigation monitoring, with clearly defined protocols and coordination with the PAC, would provide the assurance of rigorous and professional independent oversight to Pasadena residents.

Recommended authorities to consider for the IPA include:

- Conduct audits of policies, practices, tactics, training, equipment, or other aspects of the Pasadena Police Department
- Monitor investigations of all police misconduct complaints
- Provide joint access for the IAP to the PPD complaint database
- Conduct investigations of complaints in cases in which a conflict of interest exists for PPD to handle the complaint
- Conduct additional or independent investigations in cases in which the PPD does not investigate or the IPA deems the PPD investigation to be insufficient
- Conduct audits of patterns of misconduct whether or not a complaint is filed
- Monitor civil claims for police misconduct issues
- Provide real-time monitoring of critical incidents, with clear protocols for review, investigative authority, and reporting<sup>16</sup>
- Issue regular reports on activities and findings through presentations and outreach

Issues to consider in developing the IPA approach to oversight include:

- Will the authority of the IPA require a full time or part time professional position?
- What specific training and experiential background is essential for the IPA?
- Should the IPA be directed to undertake a particular order of auditing projects or identify priorities after time on the job and input from the PAC?
- To whom should the IPA report? City Manager, Mayor and City Council, Public Safety Committee, or a combination?<sup>17</sup>
- What protocols should be established for effective interfacing between the IPA and the PAC?

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<sup>16</sup> This approach might have helped the City avoid issues that arose following the shooting of Kendrec McDade. The protracted litigation concerning the release of the OIR's *Report to the City of Pasadena Concerning the Officer-Involved Shooting of Kendrec McDade* galvanized community activists who were already concerned about police accountability in the matter, and who then became angry about what they saw as a lack of PPD transparency.

<sup>17</sup> Oversight in some jurisdictions, such as that in Santa Cruz, have a dual reporting system—through the city manager's office and either the city council or a commission.

➤ Police Accountability Commission

Instituting a PAC would answer concerns from many stakeholders who indicated they want a mechanism to enhance communications between the community and the Police Department and want to be more involved in policing matters. Also, while the PAC should include representatives from across Pasadena, this approach could provide a means to help implement the recommendation made in the 2015 *Community Perceptions of Policing in Pasadena* survey that, “New avenues should be explored in terms of community outreach and gaining input from the community that specifically targets minority residents and those residents living in Northwest Pasadena.”<sup>18</sup>

Recommended authorities to consider for the PAC include:

- Hold regular public meetings to solicit stakeholder feedback about the PPD.
- In conjunction with the IPA, review and make recommendations regarding PPD staffing levels, service delivery, and police policies and practices.
- Receive reports from the IPA regarding police misconduct investigations, review of critical incidents, or other matters audited.
- Issue public reports to inform the community of recommendations and the work of the PAC.

Issues to consider in developing the PAC approach to oversight include:

- How should PAC members be selected? By appointment by members of the City Council, the Public Safety Committee, the City Manager or a combination?
- How will the PAC be staffed?
- What specific training and experiential background is essential for Commission members?
- Should the PAC report to the City Council’s Public Safety Committee or the full City Council?
- What protocols should be established for effective interfacing between the PAC and the IPA?

As the City of Pasadena moves forward on oversight, it is very important to continue to involve community members, police association representatives, and other stakeholders in the planning process, along with outside experts. Further, the Consultants recommend that whatever approach is enacted, Pasadena should build in evaluations at regular intervals, with the expectation that oversight protocols will need to be updated over time and as stakeholders better appreciate the strengths and weaknesses of particular oversight functions as they operate in Pasadena.

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<sup>18</sup> *Community Perceptions of Policing in Pasadena*, p.3.

## VII. COMPONENTS OF SUCCESSFUL OVERSIGHT

If Pasadena adopts civilian oversight, regardless of the particular model or functions involved, consideration should be given to factors important to success. Oversight practitioners have identified the attributes listed below as important in helping to make oversight credible and effective.<sup>19</sup>

**Independence**—The oversight body must be independent from special interest groups, police, and elected and other government officials. The community, as well as the police officers under oversight scrutiny, must trust that the oversight agency and its leadership are fair and unbiased. To the extent that the oversight entity has a reporting relationship within the government structure, efforts should be made to address potential conflicts of interest or disagreements that can arise.

**Support of Government Officials**—Without the political will to support civilian oversight, both at the outset and in the long term, the agency will be focused on its continuing existence, rather than working to meet its mandate.

**Access to the Law Enforcement Agency and Government Officials**—It is important for the integration of the oversight agency into the government structure that oversight practitioners have access to officials, as well as the law enforcement agency involved. Regular meetings between oversight, government representatives, and police executives ensure that everyone understands and supports each other's role in fostering police accountability.

**Ample Authority**—It is imperative that oversight organizations have the authority to meet the expectations of the communities they serve. For example, agencies with investigative authority must have the ability, via subpoena power or otherwise, to interview all witnesses, including officers, and have access to all documents and other evidence required for thorough investigations. Similarly, those charged with auditing or monitoring law enforcement policies and procedures must have access to complaint databases to allow real-time monitoring, early intervention system data, information related to claims, policy manuals, directives, tactical guidelines, training protocols, and the like.

**Reviewing Police Policies, Training and Other Systemic Issues**—Policy review is widely seen as one of the most important aspects of an oversight program in that it can effect broad organizational change in the law enforcement agency. Reviewing a police agency's policies and training, and making recommendations for improvements are functions that can be associated with any oversight approach and can make substantial

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<sup>19</sup> See FN 3, Attard and Olson.

and lasting contributions to improve policing. Procedures should be in place to track the police department's timely response to any recommendations made.

**Adequate Funding**—Oversight programs must have adequate funding and spending authority to complete the work outlined in the enabling legislation and to be effective in their efforts. Oversight agencies must have funding and authority to hire staff at a level that allows for timely, thorough, and meaningful work, whether involving investigations, reviews, audits or other functions. Funding and spending authority should provide for hiring legal counsel, if necessary, subject matter experts, and staff training.

**Core Qualifications for Effective Oversight**—In support of its training program for oversight professionals, NACOLE has developed a set of core competencies that are central to effective oversight.<sup>20</sup>

**Training for Boards and Commissions**—The NACOLE website also lists recommended training specifically for members of boards and commissions. The training falls into six basic subjects: 1) an orientation to oversight; 2) local history that led or is relevant to the establishment of oversight; 3) legal considerations related to public meetings, confidential requirements, peace officers' personnel actions, relevant case law, and local expectations of oversight; 4) information about the local law enforcement agency, e.g., history, patrol practices and procedures, general orders, procedures regarding search and seizure, booking, traffic stops, use of force, and other relevant topics; 5) agency procedures to include: intake, investigations, hearings, meetings, case review, communications, and policy recommendations; 6) ride-alongs.<sup>21</sup>

**Community/Stakeholder Support and Outreach**—Informing the community, police officers, police associations, and other stakeholders about the existence and authority of the oversight agency is vital to building trust and maintaining support. Outreach efforts should include explanation of ways that the agency works to ensure effective, impartial, and timely oversight.

**Transparency**—Regular reporting about the work of the oversight entity provides transparency and accountability to all stakeholders. Because aspects of the work of oversight may be confidential, reporting aggregate information or summaries of activities in ways that do not compromise confidentiality increases confidence in the oversight agency.

**Ethical Standards**—NACOLE has adopted a Code of Ethics to guide the practice of civilian oversight in promoting public trust, integrity, and transparency.

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<sup>20</sup> See, [www.nacole.org/wp-content/uploads/Core-Competencies-for-Civilian-Oversight-Practitioners-20110114.pdf](http://www.nacole.org/wp-content/uploads/Core-Competencies-for-Civilian-Oversight-Practitioners-20110114.pdf) The NACOLE website also provides guidelines that are useful in considering qualification standards for hiring and training oversight personnel.

<sup>21</sup> See, [www.nacole.org/recommended\\_training\\_for\\_board\\_and\\_commission\\_members](http://www.nacole.org/recommended_training_for_board_and_commission_members)

## VIII. CONCLUSION

*“The call for civilian oversight is 20 years old.”* Comment made during stakeholder outreach.

This project is an important first step for the City of Pasadena in making a decision about whether to establish civilian oversight of the Pasadena Police Department. Again, the Consultants want to acknowledge the foresight of the City in recognizing the value in bringing stakeholders into the planning from the outset. Their input has been invaluable in focusing the analysis.

Next, Pasadena must make a decision and a commitment as to the direction the City will take to enhance community confidence in the Pasadena Police Department. The Consultants recommend that civilian oversight be established and suggest a blended approach of using an Independent Police Auditor and a Police Accountability Commission. Many cities throughout California and the United States have established oversight as a means to address negative perceptions about policing, and the two-part approach recommended could help strengthen relations between the police and the community in Pasadena.

As the President of the International Association of Chiefs of Police noted in testimony given to the President’s Task Force on 21<sup>st</sup> Century Policing:

Partnerships and collaboration with the community are crucial elements of a successful community-police relationship. Community engagement should occur beyond ancillary programs and could include a citizen advisory board, or another opportunity for the community to contribute in shaping the strategic planning process for the police department.<sup>22</sup>

Similarly, the City of Pasadena can expect that civilian oversight will contribute to community engagement and trust in the vital work of the Pasadena Police Department.

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<sup>22</sup> Testimony of Chief Richard Beary, President of the International Association of Chiefs of Police, Before the Task Force on 21<sup>st</sup> Century Policing Listening Session: Building Trust and Legitimacy, January 13, 2015. [www.theiacp.org/Portals/0/documents/pdfs/Task\\_Force\\_Testimony\\_Richard%20Beary\\_IACP.pdf](http://www.theiacp.org/Portals/0/documents/pdfs/Task_Force_Testimony_Richard%20Beary_IACP.pdf)



APPENDIX

A. POWERPOINT PRESENTATION USED DURING STAKEHOLDER OUTREACH

B. OVERSIGHT AGENCIES IN AND OUTSIDE CALIFORNIA CHART



**Appendix A**  
**POWERPOINT PRESENTATION USED DURING**  
**STAKEHOLDER OUTREACH**

11

**City of Pasadena  
Analysis of Police Oversight  
Models**

Kathryn Olson and Barbara Attard

12

**Who We Are**

- Consultants in police accountability and transparency
- Past presidents of the National Association of Civilian Oversight of Law Enforcement (NACOLE)
- Presenters at conferences and training events
- Worked together on a variety of projects, including U.S./Russia exchange on civil rights and civilian oversight
- Co-authors of *Police Misconduct Complaints Investigation Manual* and articles on police oversight

13

**Steps in the Analysis of Police  
Oversight Models Project**

- Stakeholder interviews and community meetings
- Analysis of police oversight models
- Report and presentation on models of oversight

▪ Complete by March 31, 2016

14

**Survey Authority and Governance  
of Different Oversight Models**

- Selection of oversight personnel
- Involvement in the complaint process
- Authority to hear appeals
- Role in reviewing police policy
- Reporting structure
- Estimated annual cost
- Access to police personnel and case files
- Public information sharing

**Appendix A**  
**POWERPOINT PRESENTATION USED DURING**  
**STAKEHOLDER OUTREACH**

18

### Civilian Oversight Defined

An agency or procedure involving community members or civilian oversight practitioners in various aspects of the work of law enforcement

19

### Functions of Police Oversight

- Accept and refer complaints
- Investigate complaints
- Monitor or audit internal affairs investigations
- Conduct hearings and decide police discipline matters
- Handle discipline appeals
- Conduct police misconduct pattern and practice reviews
- Recommend improvements to police policy/practices/training
- Report on oversight efforts and police reforms
- Community engagement about police and oversight matters

20

### Models of Civilian Oversight

- Common names for oversight models or structures
  - Investigative
  - Auditor or Monitor
  - Review Board or Oversight Commission
  - Police Commission
  - Inspector General
- Names can be deceiving – most models are hybrids incorporating many oversight functions

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### Benefits of Oversight

- Promotes greater accountability and transparency
- Enhances quality control and risk management
- Supports effective policing
- Provides an avenue for community involvement
- Increases public confidence and trust in the police
- Protects civil rights

**Appendix A**  
**POWERPOINT PRESENTATION USED DURING**  
**STAKEHOLDER OUTREACH**

11

### Expectations for Civilian Oversight

- Knowledgeable about police practices and criminal law and procedure
- Impartial and objective - considers all sides of a situation and re-evaluates as needed
- Communicates with police stakeholders
- Complies with confidentiality laws and evidentiary standards
- Engages the community
- Inspires respect and confidence

12

### Is Oversight Right for Pasadena and What Would it Look Like?

- What are the police issues in Pasadena that oversight could address?
- Can oversight assist with any specific community concerns about the police?
- Is there a downside to bringing oversight to Pasadena?
- What is important in a successful oversight program?

13

### Thank You!

For further input, please visit the following website:  
  
(Web portal no longer available)

**APPENDIX B**  
**ANALYSIS OF POLICE OVERSIGHT MODELS**  
**FOR THE CITY OF PASADENA<sup>1</sup>**  
**OVERSIGHT AGENCIES IN AND OUTSIDE CALIFORNIA**

Oversight Agency	How Members are Selected	Role in Citizen Complaint Process and Whether Agency Hears Appeals	Extent Reviews Police Department Policy	To Whom Oversight Entity Reports?	Estimated Annual Cost of Oversight	Additional Aspects of Model: Access to Personnel Files, Case Files, and Ability to Share Information Publically
Anaheim, CA 366,265 pop 250 sworn	PSB: 5 members chosen by lottery - 4 from Council neighborhoods and 1 at large. PSB reviews fire and police budgets, staff levels, critical incidents.	External Auditor monitors critical incidents in real time and on-going IA investigations.	External Auditor collaborates with PSB to make recommendations on PD practices, procedures, training, equipment, and potential reforms.	PSB managed under CM authority.	PSB: Small training budget.	External Auditor has access to personnel and IA files; PSB does not have access to either.
Public Safety Board (PSB)	PSB reviews fire and police budgets, staff levels, critical incidents.	PSB works in conjunction with External Auditor; reviews critical incidents.	on PD practices, procedures, training, equipment, and potential reforms.	External Auditor independent entity under CM Office.	Quarter to half-time CM staff	PSB conducts outreach.
External Auditor	External Auditor attends PSB meetings, and reports on investigations monitored.	External Auditor attends PSB meetings, and reports on investigations monitored.	External Auditor attends PSB meetings, and reports on investigations monitored.	External Auditor attends PSB meetings, and reports on investigations monitored.	External Auditor attends PSB meetings, and reports on investigations monitored.	PSB works with External Auditor and CM to issue reports.
Office of Independent Review, External Auditor	External Auditor hired by CM; had previously conducted critical incident audits.	Does not hear appeals.	CM can change process, but cannot disband PSB without Council approval.	External Auditor approximately \$80,000.	External Auditor attends PSB meetings and reports on investigations monitored.	Blended approach of PSB and External Auditor is a pilot program.
Est. 2014						

<sup>1</sup> The population of Pasadena is approximately 140,000, with approximately 240 FTE officers authorized for the Pasadena Police Department.

<b>Oversight Agency</b>	<b>How Members are Selected</b>	<b>Role in Citizen Complaint Process and Whether Agency Hears Appeals</b>	<b>Extent Reviews Police Department Policy</b>	<b>To Whom Oversight Entity Reports</b>	<b>Estimated Annual Cost of Oversight</b>	<b>Additional Aspects of Model: Access to Personnel Files, Case Files, and Ability to Share Information Publically</b>
<b>Albany, NY</b> 98,424 pop 342 officers	CPRB: 9 members - 5 appointed by Mayor and 4 by CC; to reflect diversity in income, race, ethnicity, age, gender, sexual orientation and experience.	Review Professional Standards investigations of citizen complaints and findings to see if complete and professional; 1 CPRB member reviews file, talks with detective, presents to CPRB. CPRB indicates agree or disagree with finding.	Makes recommendations to CC and Mayor relevant to goal of community policing and police exercise of discretionary authority.	Mayor and CC	CPRB members are volunteers.	No access to personnel files; provided redacted investigation files (not given the name of involved officers).
<b>Citizens' Police Review Board (CPRB)</b> Est. 2000		For serious cases (UOF or civil rights), which make up about 25% of caseload, CPRB pays monitor (investigator) to attend interviews and review all evidence.			\$250,000 - 1 coordinator, 1 part-time admin. asst., law student	Conducts outreach.
<b>Maureen Obie, Coordinator, Albany CPRB</b>		disagree with finding.			research assts., monitors for some cases, security guard, and other misc. expenses (e.g., database revisions, travel).	Issues public reports.
		PC makes final decision.				CPRB associated with Albany Law School Government Law Center (GLC), seen as independent body not affiliated with PD or city government.
		Does not hear appeals.				Restarting mediation program.

Oversight Agency	How Members are Selected	Role in Citizen Complaint Process and Whether Agency Hears Appeals	Extent Reviews Police Department Policy	To Whom Oversight Entity Reports	Estimated Annual Cost of Oversight	Additional Aspects of Model: Access to Personnel Files, Case Files, and Ability to Share Information Publically
<b>Berkeley, CA</b> 112,580 pop 163 sworn	PRC: 9 members appointed by Mayor and CC.	PRC receives and investigates complaints.	Commission recommends to CC improvements to PD policies, procedures, and training.	PRC reports to Mayor and CC.	\$593,333 Staff of 3	Does not have access to personnel or internal IA files, but has access to other confidential documents and information related to PRC investigations of complaints.
<b>Police Review Commission (PRC)</b> Est. 1974	PRC Officer hired by CM with possible PRC input.	Hearing before sub-committee of PRC, or case can be closed with PRC approval.	PRC Officer reports to CM and PRC.			Conducts outreach.
Katherine Lee, PRC Officer	PRC staff hired by PRC Officer.	PRC findings are recommendations to CM.				Publishes annual reports.
<b>Claremont, CA</b> 35,000 pop 38 sworn	Commission: 7 members appointed by CC, with goal to ensure diversity in membership; Police Review Ad Hoc Committee (PRACH): 3 Commissioners rotate.	Any party to the complaint can petition to the PRC for a rehearing. PRACH reviews all formal complaint investigations for thoroughness. Makes recommendations to Police Commission, PC, CC, and CM.	Reviews policies, procedures, and practices; makes recommendations to set PD goals that reflect community values; reviews recruitment and training to promote retention of qualified and diverse personnel.	CC, CM, & PC.	No budget. Part time Admin. Asst. (Lisa Amaya, Sr. Admin. Asst.)	No access to personnel files but PRAHC has full access to complaint files.
<b>Police Commission</b> Est. 2000		Does not hear appeals.				Publishes detailed meeting minutes.
						Established to facilitate dialogue on PD issues.
						Meets every other month.

<b>Oversight Agency</b>	<b>How Members are Selected</b>	<b>Role in Citizen Complaint Process and Whether Agency Hears Appeals</b>	<b>Extent Reviews Police Department Policy</b>	<b>To Whom Oversight Entity Reports</b>	<b>Estimated Annual Cost of Oversight</b>	<b>Additional Aspects of Model: Access to Personnel Files, Case Files, and Ability to Share Information Publically</b>
<b>Davis, CA</b> 66,000 pop 61 Sworn	Selected by CM and CC.	Reviews all IA investigations; takes and refers complaints.  Does not hear appeals.	Recommends improvements to policy, practices, training.	Meets jointly with CM and CC.	Not to exceed \$60,000  2 ½ days per month at DPD.	Full access to IA files.  Conducts outreach.  No public reports.
<b>Independent Police Auditor/Ombudsman</b> Est. 2006						
<b>Bob Aaronson, Auditor</b>						
<b>Denver, CO</b> 663,900 pop 1420 sworn	COB: 6 members appointed by Mayor and confirmed by CC.  Monitor: appointed by Mayor, confirmed by CC.  Evaluated by COB.	OIM: Monitors investigations of all complaints and critical incidents and makes recommendations on findings and discipline.  Disagreements reported publically.  COB: Briefed by OIM on important cases, critical incidents, or implementation issues with Monitor's recommendations.  Does not hear appeals.	COB and OIM have authority to recommend policy improvements to CC, PC, and Sheriff; COB makes policy recommendations on discipline, use of force, and other policies; hiring; training; community relations; and the complaint process, often in conjunction with the OIM.	COB evaluates Monitor.	\$1,500,000 (includes grants) Monitor: 16 Staff COB: receives stipends and \$20,000 budget for training and consultants.	Monitor has access to disciplinary records and IA files.  Conducts outreach.  Issues public reports.  Oversees PD and Sheriff's Office.  Has mediation program.
<b>Office of the Independent Monitor (OIM)</b>						
<b>Nick Mitchell, Director</b>						
<b>Citizen Oversight Board (COB)</b> Est. 2005						

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<b>Eugene, OR</b> 156,000 pop 190 officers	CRB: 7 members appointed by CC; monitors Police Auditor activities; Auditor staffs CRB.	Auditor receives and classifies complaints, monitors IA investigations, participates in interviews, audits and reviews completed investigations.	Makes policy recommendations.	CC	\$459,000 (2016 budget) Auditor, Deputy Auditor, Admin Asst.	Access to IA files (unclear as to personnel files).  Does outreach.  Auditor and CRB issue public reports.
<b>Eugene Police Auditor</b> Mark Gissiner, Police Auditor						
<b>Civilian Review Board (CRB)</b>	Police Commission: 12 citizens who advise CC, PC and CM (no review of complaints).	Recommends findings (no formal discipline recommendations).				Can compel production of non-criminal investigation docs.  Critical incident roll out.
<b>Police Commission</b> Est. 2006	review of complaints).	Consults with CM on complaints against PC; monitors criminal complaints but does not participate.				Concurrent access to IAPro and Blue Team.  Jurisdiction: sworn and non-sworn.
		Auditor identifies "Community Impact Case;" CRB hears case, makes finding recommendation to PC.				Publishes weekly complaint summary.  Mediation at discretion of Auditor; paid mediators.
		Does not hear appeals.				



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<b>Fresno, CA</b> 520,000 pop 710 officers	Independent Reviewer hired by CM with input from Mayor, PC, CC, FPOA, and 2 members of community.	Reviews IA investigations; provides guidance to officers and managers when requested.	Primary focus: audit of each PD unit to ensure compliance with policies and procedures, best practices and the law.	CM.	\$200,000	Unclear on access to personnel files; full access to IA files.
<b>Office of Independent Review</b> Est. 2009		Audits inquiry and complaint logs, UOF investigations (including OIS), in-custody deaths, vehicle pursuits resulting in serious injury or death, bias complaints, collisions during pursuits, claims of retaliation for complaint, all other complaints.	Recommendations and findings aim to increase thoroughness, quality and accuracy of each police unit.		Independent Reviewer approximately \$80,000 for 20 hrs/week, at least 18 visits/year, 4 quarterly reports.	Conducts outreach. Issues 4 quarterly reports/year.
<b>Richard Rasmussen, Independent Reviewer</b>		Does not hear appeals.			Also employs second person assisting with audits and Exec Assistant (cost unknown).	Guiding principles: independence, fairness, integrity and honesty, transparency, stakeholder participation, acceptance, cooperation and access; and legal obedience.

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<b>Inglewood, CA</b> 116,000 pop 186 sworn	CPOC: 11 members - 2 appointed by the Mayor, 2 from each CC district, and 1 by PC.	Refers complaints to PD. PD reports investigation of external complaints to CPOC in closed session. CPOC recommends discipline to PC; PC makes decision.	Does not review PD policy.	CC, CM and PC.	\$5,000 budget, for training. Asst. CM supports CPOC part-time. (Michael Falkow Asst. CM, Staff)	No access to personnel files; access to IA files in closed session.  Does not conduct outreach.  Publishes minutes of meetings.
<b>Citizen Police Oversight Commission (CPOC)</b> Est. 2004		Does not hear appeals.				
<b>Long Beach, CA</b> 460,000 pop 800 sworn	11 members appointed by Mayor, confirmed by CC; 1 from each CC district; 2 at large.	Takes complaints, investigates (at the direction of CPCC) cases with force, false arrest, sex, or race issues. Also, reviews IA investigations. Holds hearings to facilitate the fact-finding process.	Findings can result in policy changes.	Reports to CM who has final disciplinary authority.  Investigator reports to CPCC.	\$239,634 (2015 budget) 3 Staff: Director and 2 Investigators	No access to personnel files but reviews IA investigations.  Conducts outreach.  Issues annual reports.  The CM can make public the disposition of a complaint investigated by the CPCC.
<b>Citizen Police Complaint Commission (CPCC)</b> Est. 1990	CM appoints Executive Director and independent investigator.					
Anitra Dempsey, Executive Director		Complaints classified "No Further Action" can be appealed to the CPCC.				

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<b>Los Angeles, CA</b> 3,884,307 pop 10,000 sworn	Commission: 5 civilians appointed by the Mayor and confirmed by CC.	BOPC: Oversees LAPD and the IG. Has final adjudicative authority over findings in officer-involved shootings (OIS), in-custody deaths, and other serious uses of force. (Disciplinary decisions made by PC).	BOPC sets policy for LAPD.  OIG: May initiate audits of police practices, which can only be shut down by majority vote of the BOPC.	OIG reports to BOPC.	OIG: Staffing costs: \$6,000,000 30 staff, additional costs within LAPD budget	BOPC and OIG have access to personnel and IA files.  Conducts outreach.  Issues public reports. Prepares and publically posts redacted reports of each incident.
<b>Board of Police Commissioners (BOPC)</b>	IG supports BOPC.				BOPC:	
<b>Office of Inspector General (OIG)</b> OIG Est. 1995		OIG: Primary focus is reviewing OIS and significant UOF that result in death or hospitalization. Makes non-binding recommendations on individual cases through a report to BOPC. Conducts investigations of complaints against PC.	OIG reports and any associated recommendations are generally presented publicly, and may result in the Commission making policy changes.	Director and support staff included as part of LAPD budget	OIG responds to scene of categorical use of force incidents and oversees on-scene investigation.	
Alex Bustamonte, Inspector General		Appeals to BOPC: Officers may appeal discipline (not finding) in categorical UOF.				OIG provides oversight of the airport police.

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<b>Novato, CA</b> 55,000 pop 59 sworn	PARC: 5 members appointed by CC. All but one must live within the City limits; one may live within the three zip code areas designated for Novato.	Reviews citizens' complaints referred by the City Manager.  Complainant can appeal to CM, and CM refers to PARB for appeal hearing in closed session.	Provides for community participation in PD policies, procedures, and practices.	Reports annually to CC on activities.  Recommends findings on appeals hearings to CM.-	No budget.  Part-time support staff (Dan Weakley, HR Manager)	In appeal cases, commission can review investigation report at PD.  PARB has subpoena power through City Attorney's office, though officers typically cooperate with hearing process..  No outreach.
<b>Police Advisory and Review Commission (PARC)</b> Est. 1992						
<b>Oakland, CA</b> 406,000 pop 650 officers	CPRB: 9 members, plus alternate nominated by Mayor and confirmed by CC.	Investigates citizen complaints; can initiate complaint.  Investigator presents case to Board, which holds evidentiary hearing.	Makes recommendations on PD policy and procedure.	Recommends findings to CM and PC; meet to discuss; CM. makes final decision.	\$1.3 million Exec Director, Policy Analyst, Office Asst., 4 investigators, 3 intake tech.	Annual reports to CC with aggregate information. No access to personnel files; access to IA files.  Conducts outreach.  Issues public reports.
<b>Citizens' Police Review Board (CPRB)</b> Est. 1980						
Anthony Finnell, Executive Director		Does not hear appeals.				Has subpoena power; policy requires officer cooperation. IA building tracking system with some mutual access; CPRB computer terminal in IA; single point of contact in IA helps protect confidentiality.

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<b>Palo Alto, CA</b> 67,000 pop 169 officers	IAP selected by CM, approved by CC.	Reviews citizen and internal investigations by IA; assesses for objectivity, thoroughness and appropriateness of disposition; can receive complaint but referred to IA.	Makes policy recommendations. Reports reviewed by PC (for fact check), City Attorney, CM, and then on CC agenda.	IAP meets with CC twice/year.	Not to exceed \$26,000  Reviews 10 – 20 cases/year.	Full access to personnel and IA files, along with other records.  Conducts outreach.
<b>Independent Police Auditor (IAP)</b> Est. 2006		Recommendations to PC re: further investigation, process, and disposition.			Formally meets with CM and PC once/quarter to discuss issues	Issues reports 2 times/year.  Does special audits and reports, as needed.
<b>Office of Independent Review, IAP</b>		Does not hear appeals. Staff investigates complaints of misconduct. Findings forwarded to the Mayor, CM and PC for final decision.	Recommends improvements to PD policies, practices and procedures.	Mayor and CM.	\$280,000 Four staff: Director, 2 investigators, Admin. Assistant	Has access to IA files and confidential information.  Issues public reports.  Conducts outreach.
<b>Philadelphia, PA</b> 1,560,300 pop 660 sworn	PAC: 6 Commissioners appointed by the Mayor from applicants referred by CC.					
<b>Police Advisory Commission (PAC)</b> Est. 1993		Does not hear appeals.				
<b>Kelvyn Anderson, Director</b>						

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<b>Richmond, CA</b> 108,000 pop 180 officers	Commission: 9 members appointed by Mayor after conferring with CC; strive for diverse social, economic and political interests; 3-yr appt. CC appoints Investigative and Appeals Officer to assist Commission.	Roles and protocols of newly formed OPA and Commission are in development.	Commission reviews PD policies, practices and procedures and strategies to promote police/community relations. If Commission unsatisfied with PD response, can submit to CM or to CC for final action.	PC, CM and CC all have roles with Commission.	Police Commission members serve without pay.	OPA will have access to personnel and IA files; Commission's access unclear.
<b>Police Commission</b> Est. 1984	OPA handle intake of all complaints.	OPA handle intake of all complaints.	Commission reviews police/community relations. If Commission unsatisfied with PD response, can submit to CM or to CC for final action.	OPA reports to PC.	OPA Director's salary is \$165,000, and has a take home car.	Commission conducts outreach.
<b>Office of Professional Accountability (OPA)</b> Est. 2016	Commission's investigatory authority has been expanded, but as of now, can investigate citizen complaints related to UOF or racially abusive treatment and appeals from OPA ;	Commission makes findings based on clear and convincing evidence. Reviewed by PC and CM for final decision.				Commission posts meeting agendas and minutes.
Eddie Aubrey, OPA Director	OPA Director is civilian inside PD managing IA staff (2 sergeants) and overall investigation process.					Commission has subpoena power.
						OPA Director's role with regards to outreach and report publication is under development.

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<b>Riverside, CA</b> 317,000 pop 409 sworn	CPRC: 9 members appointed by CC.	Conducts independent review of officer involved deaths and citizen complaints; can contract with independent investigators for OI cases; forum for public to express opinions.	Recommends improvements to policy, practices, and procedures; posts recommendations and RPD response and draft changes.	Advises Mayor and CC; recommends findings to CM and PC.	CPRC members are unpaid. \$253,000 for 2014-2015.	No access to personnel files; some access to IA file material. Does outreach.
<b>Community Police Review Commission (CPRC)</b> Est. 2000				Manager and office support paid through CM office.		Publishes reports. Subpoena power.
<b>Sacramento, CA</b> 470,000 pop 708 sworn	OPSA: Director, professional staff appointed by CM CPC: CC appoints 11 members. Also staffs Community Racial Profiling Commission.	OPSA tracks and monitors high profile/serious complaints, reviews completed IA investigations; refers to CM if deficient. May interview witnesses for clarifying information. Does not hear appeals.	Examines and critiques the SPD's efforts to work within communities of color. OPSA recommends improvements to policies, procedures, training.	OPSA reports to CM.	OPSA: \$250,000, Director, plus staff support from CM's Office.	No access to personnel files; access to IA files Conducts outreach. Issues annual reports. Oversees police and fire.
<b>Office of Public Safety Accountability (OPSA)</b> Est. 1999 Francine Tournor, Director						
<b>Community Police Commission (CPC)</b> Est. 2015						

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<b>San Diego, CA</b> 1,400,000 pop 2100 officers	CRBPP: 23 members representing diverse cross section of SD (plus, up to 23 prospective members); appointed by Mayor; 1 yr term; Mayor also appoints Executive Director.	3-person team from CRBPP reviews case and then full Board discusses findings and recommendations. Reviews and evaluates IA investigations (force, arrest, criminal conduct, discrimination and slurs); reviews and evaluates OIS and in-custody deaths to ensure thorough and fair.	Makes recommendations on policy and procedures to PC and Mayor, with goal to promote fair, humane policing and ensure safety of citizens and police.	Mayor	\$1115,000 Executive Director; unknown salary for part-time Exec. Asst.	No access to personnel files; access to IA files. Does outreach. Issues public reports.
<b>Citizens Review Board on Police Practices (CRBPP)</b> Est. 1990						
Sharmaine Moseley, Executive Director						
<b>San Francisco, CA</b> 852,500 pop 1971 sworn	OCC Director appointed by Police Commission; OCC Staff appointed by Director.	OCC receives and investigates all community complaints. (IA only investigates internal complaints.) Makes findings, OCC attorneys present case to PC or Police Comm. for discipline.	Recommends improvements to PD policies, procedures, training to Police Commission. Commission oversees OCC and Police Dept.	Police Commission	OCC \$5,562,000 34 staff, 15 investigators.	OCC conducts public outreach and issues annual and other periodic reports. Mediation program.
<b>Office of Citizen Complaints (OCC)</b> Est. 1983 Joyce Hicks, OCC Director	Police Commission appointed by Mayor and Board of Supervisors	OCC appeal process for officers and complainants, but seldom used.			Commission Estimate, \$200,000 Staffed by sergeant and admin. asst.	
<b>Police Commission</b> Est. 1878						



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<b>San Jose, CA</b> 1,015,785 pop 900 sworn	IPA appointed by Mayor, City Council	Receives complaints, refers to PD for IA investigation. Monitors investigation, can sit in on officers interviews. Can request additional inv. if deficient. Appeal to CM if not satisfied.	Recommendations made to City Council for improvements to PD policies and procedures, training.	Mayor, City Council	\$1,284,500 6 Positions	No access to personnel files; full access to complaints and IA investigations from public and OIS reports.
<b>Independent Police Auditor (IPA)</b> Est. 1993 Walter Katz, IPA	Has community advisory board selected by IPA.	Does not hear appeals				Conducts extensive public outreach, publishes "Student Guide to Police Practices," outreach to youth. Issues public reports.
<b>Santa Cruz, CA</b> 63,000 pop 94 officers	IPA selected by CM.	Reviews all internal and external IA investigations to evaluate quality and thoroughness; can sit in on interviews; can review and provide feedback as investigation is in progress; can request, through the CM, further investigation or conduct investigation himself.	Reviews and makes recommendations regarding PD policies and practices, both informally and through reports on selected issues.	By contract, reports jointly to CM and CC;	IPA approx. \$54,000 2 days/month at SCPD and once/month ride-a-long with officers. Available 24/7 to respond to calls and emails from SCPD and citizens concerning IA matters.	Full access to personnel and IA files and all other documents and staff. Does outreach. Does not issue regular reports. Is able to coach individuals at all levels of organization. Does not roll out to critical incidents or review in-custody deaths, other than in context of IA investigation.
<b>Independent Police Auditor (IPA)</b> Est. 2003 Bob Aaronson, Auditor		Does not hear appeals.		Meets with Public Safety Committee (PSC); provides a confidential audit report of every IA investigation reviewed and views PSC as providing oversight of IPA.		

