

REPORT TO CITY COUNCIL

FROM: Dorothy Ann David, City Manager

DATE: April 22, 2016

SUBJECT: Citizen Review of Police Complaints SS 2016-022

A. Introduction: The purpose of this report is to provide Council with an overview of Citizen Review models for police complaints, including models which incorporate subpoena power. This Study Session was scheduled at the request of Council.

B. Recommended Action: The Administration recommends that City Council direct the Chief of Police to form a working group to conduct further research, obtain citizen input, and develop specific recommendations for Council consideration regarding citizen review of police complaints.

C. Prior Council Action:

- In December 1998 the City Council discussed the Police citizen complaint review process.
- In early 1999 the City Council adopted Council Bill 99-066 amending the purpose of the Human Relations Commission to include auditing aggregate statistics on citizen complaints against the police.
- On July 27, 2007 City Council held a Study Session and reviewed a report (SS 2007-053) by the Police-Community Relations Committee regarding a Police Review Board. Although Council directed staff to make some procedural changes, they also directed staff not to establish a review board.
- On December 8, 2009 the City announced several initiatives, one of which was focused on improving the police complaint process.
- On June 22, 2010, City Council held a Study Session and directed staff to implement changes to the police complaint process focused on how citizens may file complaints, offering mediation as an alternative, reporting the results of an investigation, and public education.
- On February 7, 2013 City Council held a Study Session and reviewed a Report (SS 2013-007) summarizing changes to the complaint process that were initiated by the Police Department.

D. Summary:

- Over the past decade, police departments across the country have been challenged to improve their complaint processes. Many departments have made changes to their complaint process; some cities have adopted some form of citizen review and others have established processes for the mediation of citizen complaints.

- There is no single model for review and most communities have tailored their process to meet their own needs.
- Advocates of citizen review believe that citizen confidence in a complaint investigation is enhanced when the investigation is reviewed by an independent body and that independent review can provide a framework for dialogue on police issues and improve police-community relations.
- Citizen review can include oversight functions beyond citizen complaints. Although the Department already has rigorous review processes for internal investigations and use of force incidents, those functions could be included in the process for citizen review if Council desires.
- In an effort to ensure an open, accessible, fair, and credible citizen complaint process, the City and the Police Department have made changes to the Department's complaint process on several occasions over the past decade. Notable changes to the complaint process were made in 2006, 2009, and 2013.
- Research indicates that the rate of sustained findings does not vary in a statistically appreciable manner when alleged police misconduct is investigated or reviewed independently.
- In almost all cases in which citizen review is utilized, discipline is still imposed by the Chief of Police.
- Staff recommends the formation of a working group which will be tasked with conducting additional research and an in-depth review of citizen review models, gathering citizen input, identifying the strengths and weaknesses of the current police complaint process, and making recommendations for Council consideration.

E. Background:

1. National Trend Towards Citizen Review of Police Conduct. Over the past decade or so, police departments across the country have been challenged to improve their complaint processes. Many departments have made revisions to their complaint processes and a number of cities have adopted some form of citizen review.

Basically, the concept of citizen review is defined as a procedure under which law enforcement conduct is reviewed at some point by persons who are neither sworn officers nor affiliated with the department. Advocates of citizen review believe that citizen confidence in a complaint investigation is enhanced when the investigation is reviewed by an independent body and that independent review can provide a framework for dialogue on police issues and improve police-community relations.

According to the National Association for Civilian Oversight of Law Enforcement (NACOLE), the primary goals of citizen review should be:

- To support effective policing;
- To increase confidence in a police department;
- To ensure accountability;

- To help manage risk;
- To protect civil rights; and
- To create a bridge for police-community relations.

Research indicates that there is no standard approach to implementing citizen review; there is no single model, and it is difficult to find two review boards that are identical. Each community has tended to tailor the various components of its own process to meet the particular needs of the agency involved and the community it serves.

Generally, the duties of a citizen review board are restricted to reviewing an already completed internal police investigation, but some more recent citizen review models have provided Board members with both investigative and review authority.

2. Research Findings. The subject of citizen review has been studied extensively, and in the course of researching this topic staff reviewed a variety of materials including those prepared by the U.S. Department of Justice/National Institute of Justice, the Citizen Review of Police, the National Association for Civilian Oversight of Law Enforcement (NACOLE), the International Association for Civilian Oversight of Law Enforcement (IACOLE), Police Chief Magazine, and the United States Commission on Civil Rights.

These sources offered the following insight regarding citizen involvement in the police complaint process:

- Each form of citizen review can serve to improve the credibility of an investigation.
- Each form of citizen review can effectively serve to “open up” the Police Department and contribute to dialogue about community concerns.
- The functions of the review board are at least as important as the structure.
- The talent, fairness, dedication, and flexibility of the key participants and the resources given to them will be far more important in determining the success of a process than the structure.
- In almost every case in which some form of citizen review has been implemented, citizen complaints rose following implementation.
- The investigation of any incident will often be complex, time-consuming, and require investigative and technical expertise, particularly as it relates to criminal law, police policy and procedure, and applicable labor laws and collective bargaining agreements.
- The most basic investigations take 6-8 hours to conduct and document, and complex investigations can take dozens of hours. As such, many of these investigations will be beyond the scope of a volunteer’s time and hiring an individual or a group of individuals to conduct them will be costly.
- Non-sworn personnel conducting investigations will have limited access to certain information, particularly criminal justice information, as access to such information may be restricted by law.
- In almost all cases in which a process for citizen review has been implemented, the power to discipline is retained by the Chief of Police.
- Statistically, there is no appreciable difference in the rate of misconduct findings between police investigated and independently investigated complaints. Rates of “sustained”

misconduct findings are 10-15% in either case. The rate of “not sustained” findings also does not change as a result of citizen review; in many cases there is still a lack of independent, credible evidence which would enable a conclusive finding.

3. Legal and Policy Framework. Implementation of citizen review would be subject to a number of laws and policies. Some of these are briefly described below:

- a. A Citizen Review Board is not a Separate Legal Entity from the City.** A citizen review board functions as a sub-unit of government. As such, any appointed review board is subject to the laws that apply to City government. Also, the City is ultimately accountable and liable for the actions of the board. Like other boards and commissions, staff support would be provided to the board to ensure that it would operate consistent with applicable statutes and local ordinances.
- b. Accountability within Chain of Command.** Another major consideration is maintaining the integrity of clear lines of responsibility and accountability for employees of the City. Currently, it is clear that police officers are accountable to the Chief of Police, who is accountable to the City Manager, who is accountable to the Mayor and City Council, who are accountable to the voters. Clear lines of accountability are fundamental to organizational effectiveness and contribute to clear performance expectations and fair employment processes.
- c. Labor Contract.** The labor contract between the Fraternal Order of Police and the City of Champaign delineates procedures for officer discipline and review. The current contract with the FOP contains language regarding “panel investigations,” but the City would likely have to bargain over the impact of changes to the complaint process to include the involvement of citizen review.
- d. Disclosure of Files and Records.** A board would have access to very sensitive information and records of board proceedings and related documents would be of public interest, including to both civil and criminal litigants. Board documents and records would be subject to the Freedom of Information Act (FOIA). The FOIA is a Federal law which provides for the full or partial disclosure of information and documents controlled by government entities. The City, and by extension, a review board, would also be required to comply with applicable records retention acts and personnel records acts. Records exempt pursuant to FOIA may still be discoverable in civil litigation.
- e. Open Meetings Act.** The Illinois Open Meetings Act (OMA) is designed to ensure that the public has access to information about government and its decision-making process. A Board would be a public body and thus subject to the Open Meetings Act, including requirements for posting of meetings and minutes.

- f. **Brady Disclosures.** This term comes from a United States Supreme Court case in which the Supreme Court ruled that the prosecution may not suppress evidence which may be favorable to a defendant. As a result of this ruling, prosecutors have an affirmative duty to disclose evidence to the defense, particularly that which either indicates that an individual may not be guilty or which would enable the defense to effectively impeach a government witnesses. A Citizen Review Board would create an additional source of information “constructively” possessed by the prosecutor in a criminal proceeding.
- g. **Garrity Rights.** This term stems from the Fifth Amendment to the United States Constitution which declares that the government cannot compel a person to be a witness against himself/herself. Statements made by an employee to an employer under the threat of termination are “compelled” and thus cannot be used in a criminal proceeding. A review board is not an employer and does not have the power to terminate an employee; it therefore cannot “compel” testimony under threat of termination. The City, as an employer, could demand that an employee testify before a review board under threat of termination.
- h. **Uniform Peace Officers’ Disciplinary Act.** Also known as the Police Officers’ Bill of Rights, this Act requires employers to follow certain statutory requirements prior to the interrogation of an officer. Most notably, the Act requires that officers be informed of the nature of an investigation in writing in advance of an interrogation, that they are given an opportunity to be represented by counsel, and that they be provided with copies of materials related to an investigation.
- i. **Subpoena Power.** A subpoena is defined as a command for an individual to produce documents, materials, or other evidence or to appear in court or another legal proceeding to support the facts at issue in a pending case. The term “subpoena” literally means “under penalty,” and most subpoenas are court-ordered. A person who does not comply with the terms of a subpoena may be subject to civil or criminal penalties such as fines, jail, or both. As an employer, the City may have some ability to require that officers appear before a review board should one be established. That ability, however, may need to be specifically addressed through the labor agreement.

Currently, the City can only compel a citizen to appear and/or produce documents, materials, and/or other relevant evidence through a court order, so the inclusion of subpoena power in a citizen review process would provide a board with the authority to accomplish those things without a court order.

4. Types of Citizen Review. Most forms of citizen oversight within the United States are based upon one of the following models. In reviewing the agencies that utilize the various models, please note that some of them are listed under more than one model. This is due to the fact that those agencies use hybrid forms of citizen review which incorporate the traits of more than one model:

- a. **Type 1 – Investigative.** In this type of citizen review, a non-sworn employee investigates allegations of police conduct and recommends findings to the Chief of

Police. Although in most cases an investigator is a full-time paid employee of the unit of government that oversees police operations, a paid contractor could be utilized to conduct these investigations. To whom these investigators report is largely dependent upon the unit of government involved and/or the form of government in place.

Research indicates that subpoena power is typically, but not always, limited to Type 1 Investigative models of review and only a small percentage of the citizen review boards in existence in the United States are based upon the Type 1 model. Those boards have been established almost exclusively in major metropolitan areas, and available data indicates that 6 of them have been granted subpoena power. Research further indicates that subpoena power is very rarely utilized by citizen review boards possessing that authority; in fact, in several cases a Board possessing subpoena power has never utilized that authority.

Cities utilizing the Type 1 Investigative model include: Berkley, California; San Francisco, California; Flint, Michigan; Minneapolis, Minnesota.

- Pros – Regarded as the most independent type; can help to reassure the public that investigations are thorough and fair; an investigation directed by a multi-member board usually results in broad representation; can provide an avenue for community members to communicate concerns to a police department and other government officials.
 - Cons – Because citizens often lack the time and expertise to thoroughly conduct an investigation, the cost of hiring an experienced, professional investigator makes this potentially the most expensive model; may cause resentment by rank and file police officers and has the potential to cause morale problems; typical models have no mechanism for soliciting the public’s input and will not be fully effective if those components are not a part of the system.
- b. Type 2 – Advisory.** A police administrator investigates allegations of misconduct and develops findings; a review board (which could either be comprised of volunteers or non-police City staff) reviews those findings prior to any disciplinary action and recommends that the Chief of Police either accepts or rejects those findings. This model strongly resembles the City’s current model which relies on the Community Relations Office for independent review.

Cities utilizing the Type 2 Advisory model include: Orange County, California; Rochester, New York; Tucson, Arizona.

- Pros – Provides for citizen input while still allowing an experienced investigator to conduct the investigation; gives an investigation greater credibility than a completely internal review can provide; tends to be cost efficient since volunteer appointees conduct the reviews; allows for other functions such as community outreach and public education; public meetings, if held, provide a mechanism for public input.

- Cons – Is less independent than the Type 1 model; may not fully resolve community concerns about the complaint process; requires volunteers with expertise who are willing to make a time commitment.

c. **Type 3 – Appellate.** A police administrator investigates allegations of misconduct and develops findings. The Chief of Police either accepts or rejects those findings and, when appropriate, issues discipline. Complainants may appeal the investigative findings established by the police department to a review board. That board reviews the investigation and recommends findings to the Chief of Police. The board’s findings are most commonly advisory in nature.

Cities utilizing the Type 3 Appellate model include: Urbana, Illinois; Portland, Oregon.

- Pros – Provides for citizen input while still allowing an experienced investigator to conduct the investigation; gives an investigation greater credibility than a completely internal review can provide; tends to be cost efficient since volunteer appointees conduct the reviews; allows for other functions such as community outreach and public education; provides a mechanism for public input.
- Cons – Provides no mechanism for input prior to the final disposition of a complaint as the recommendation occurs after the Chief of Police has reached a finding; it can be difficult to reverse the Chief’s decision after the fact; provides less oversight and is less independent than the Type 1 model because the investigator is an employee within the department; because of the stage at which citizen review occurs, this model may not fully resolve concerns about the complaint process

d. **Type 4 – Auditor.** A police administrator investigates allegations of misconduct and develops findings and an independent auditor is appointed to investigate the process by which the police department accepts and investigates complaints. The auditor does not actually conduct complaint investigations but instead reports on the fairness and thoroughness of the process to both the police department and the public. In some instances the auditor is also asked to review departmental policies and procedures. Most auditors are either full-time staff members in the Mayor or City Manager’s office or private attorneys working under fixed term contracts.

Cities utilizing the Type 4 Auditor model include: Portland, Oregon; Tucson, Arizona.

- Pros – Can be effective in monitoring the professional standards/internal affairs function; provides for the opportunity to identify problems and recommend improvements to the complaint process; can help to enhance public confidence in the complaint process; tends to fall in the mid-level price range; only requires one person.

- Cons – Leaves the oversight process to a single person; many advocates of citizen review do not believe that auditors are fully independent; cost.

A table showing the types and features of nine communities' citizen oversight systems is provided as Attachment A to this memorandum.

5. Citizen Review in the State of Illinois. Citizen Review Boards are not particularly prevalent in the State of Illinois, but there are a few existing models.

- a. City of Chicago.** In response to concerns about the Chicago Police Department's Office of Professional Standards, the Chicago City Council implemented the Independent Police Review Authority (IPRA) in 2007. The IPRA has the responsibility to receive complaints of alleged misconduct on the part of Chicago police officers. Depending upon the nature of the allegations, either the IPRA or the Chicago Police Department's Bureau of Internal Affairs will investigate the complaint. Discipline for sustained violations resulting from those investigations is handled by the Chicago Police Board. The Chicago Police Board has the responsibility to decide cases in which the Superintendent of Police files charges to discharge an officer or suspend an officer for more than 30 days and to decide matters in which the Chief Administrator of the IPRA and the Superintendent of Police do not concur on the discipline to be administered. The IPRA most closely resembles the Type 1 Investigative model.
- b. City of Urbana.** Locally, the Urbana Police Department implemented Citizen Review in January 2007. Urbana's Citizen Review Board, which has not been modified since its inception, is based upon the Type 3 (Appellate) Model, and it allows complainants to file an appeal within 30 days following the Chief's findings on a complaint. Urbana's Board has the latitude to remand a complaint back to the Chief of Police with a recommendation for additional investigation, or to recommend that the Chief of Police change the findings of an investigation. The Board's recommendations are advisory in nature; they are forwarded to the Chief of Police through the chief executive, which in Urbana's case is the Mayor. Under the Urbana form of government and staff accountability system, the Mayor has the authority to direct the Chief of Police to change an investigative finding.

The Urbana Police Department has averaged between 10-15 complaints annually since 2007. Since the implementation of Citizen Review in 2007, Urbana's Board has heard a total of 3 appeals. In two of those appeals the investigative findings were upheld. The third case was referred by the Board to Urbana's Human Relations Officer for mediation, but the complainant declined to participate in mediation.

Urbana's Citizen Review Board also has the ability to request that the City Attorney issue a subpoena to compel testimony or produce documents, materials, or evidence, but no such request has ever been made.

6. Current Process for the Review of Complaints. In an effort to ensure an open, accessible, fair, and credible citizen complaint process, the City and the Police Department have made changes to the Department's complaint process on several occasions over the past decade.

Changes to the complaint process were most recently made in 2013. At that time, Police Administration implemented changes in an effort to ensure Police accountability and increase public transparency throughout the process. This was primarily accomplished by including the Community Relations Office in the complaint intake, complainant interview, and investigative review processes. The following is a summary of the current City of Champaign Police Complaint Process:

All citizen complaints are reported to and tracked by the Community Relations Office and, although Professional Standards retains responsibility for the complaint investigation, all related materials and the investigation itself are continually available to the Community Relations Office. This change was intended to help ensure that complaints are investigated in a timely fashion and to allow the Community Relations Office to serve in an advisory role throughout the process.

A representative of the Community Relations Office is afforded the opportunity to be present during interviews and/or re-interviews with complainants. Additionally, prior to the onset of a citizen complaint investigation, the Office of Professional Standards consults with the Community Relations Office to outline the steps to be taken during the investigation. This change was intended to allow Community Relations Office staff the opportunity to have input into the investigative process.

At the conclusion of each citizen complaint investigation, a copy of the investigation is forwarded to the Community Relations Office for review. If Community Relations Office staff disagrees with the complaint findings or has concerns with the investigation, then a review committee is convened to discuss the complaint investigation and final disposition. Although such a committee has never been convened, if one were to be it would include the investigating supervisor, the police administrators who reviewed the investigation, and a representative of the Community Relations Office. In such cases, the review committee would have the latitude to recommend different findings or additional investigative steps to the Chief of Police.

Complaint investigations centered on legal issues such as search, seizure, arrest, and/or the use of force may also be referred to the City Attorney's office for review. Although this has only been necessary on a handful of occasions, Legal staff has been particularly helpful when called upon.

7. Previous Council Consideration of Citizen Review. In December 2009, the City announced several initiatives, one of which was focused on reviewing the police complaint process in order to make recommendations to the City Council for improvements based upon citizen feedback.

In following through on that initiative, the City Manager established a Police Complaint Process Working Group and sought members to assist in reviewing the police complaint process. Members of the working group included citizens representing the Human Relations Committee,

the Champaign Community and Police Partnership (CCAPP), Police Department Administration, the Fraternal Order of Police, and staff from the Community Relations Office.

The Police Complaint Process Working Group met eight times over a period of approximately 6 months and held two public meetings which were focused on gathering public input. As a result of their review, the Group concluded that, while the complaint process was handled professionally and treated very seriously by Police Administration, the process could be improved.

The Police Complaint Process Working Group ultimately made recommendations for improving the police complaint process in four specific areas:

- a. Making a Complaint.** The complaint process should be less threatening and complaints should be easier to file, with complaint forms available at multiple locations and on the Police Department website.
- b. Offering Mediation.** An option to the formal complaint process, such as mediation, should be offered.
- c. Reporting the Results of Investigations.** The Human Relations Commission should audit the police complaint process, and reports such as the Annual Report provided by the Police Department need to be more transparent.
- d. Educating the Public.** The process must be more understandable and open to the public.

On June 22, 2010, City Council reviewed Study Session 2010-044 and unanimously directed Police staff to implement each of the recommendation made by the Police Complaint Process Working Group.

8. Formation of Working Group. Similar to the process used when Council last considered citizen involvement in the police complaint process in 2009, staff recommends that the first step would be to convene a working group to study the issue more in-depth. The formation of a working group, consisting of members who have been selected by the Chief of Police, that is tasked with gathering input and making specific recommendations for improving the existing complaint process would enable the Police Department to gather information from the parties most affected by the process. Membership should include interested citizens, persons with investigative expertise, representatives of the Fraternal Order of Police, and employees from within the Police Department. Such a group allows community members and employees to be consulted and given opportunities to provide input prior to final action by Council on this issue.

A small group of stakeholders, working with police administration, can provide feedback on the current complaint process, evaluate how citizen review models might interface with and improve the current process, and serve as a body to facilitate broad public input on the topic prior to Council deliberation. An open input process will also promote public education on the topic. Citizens and staff should have a clear understanding of the process and how they will be impacted by any changes prior to implementation. By evaluating the current process in tandem

with citizen review models, the City can build an improved system based upon the strengths of the current complaint process while addressing public concerns.

If Council decides to proceed with this recommended process, staff proposes that the scope of the working group's activities include:

- Examining the current processes for the intake, investigation, and review of citizen complaints and making recommendations for improving those processes.
- Reviewing the Police Department's history with regards to internal investigations and the review of use of force incidents and making recommendations for improving the current review processes for both.
- Evaluating citizen review models in comparable communities and recommending whether elements of those models should be implemented. Recommendations could include: defining the scope of citizen review; what types of employee conduct should be subject to citizen review; whether review should be conducted internally or externally and with volunteers or paid investigators/reviewers; at what stage in the process citizen involvement should occur, and; whether subpoena power should be included.
- Gathering input about the police complaint process and citizen review models prior to Council consideration.
- Proposing a process for periodic reporting and evaluation of the complaint process.

9. Next Steps / Timeline. If Council supports the staff recommendation and directs the Chief of Police to form a working group to study the current complaint process and make appropriate recommendations, the Chief of Police will solicit and select volunteers to sit on the working group within 45 days. Although it would be preferable to convene the working group for its first meeting within 90 days, doing so may make it difficult to allow for campus/student participation.

The working group will meet on a monthly basis, post information about meetings on the City's website, conduct meetings which are open to the public, and strive to finalize its recommendations within 6 months. Staff will provide monthly progress reports to Council and also report back to Council when the group's recommendations are complete.

F. Alternatives:

1. Direct staff to convene a working group as described in this report to conduct further research, obtain citizen input, and develop specific recommendations for Council consideration regarding citizen review of police complaints.
2. Do not direct staff to proceed as proposed and provide further direction.

G. Discussion of Alternatives:

Alternative 1. The Chief of Police and Police Administration would proceed to convene a working group based upon the information contained in this report. Council direction provided at the April 26, 2016 Study Session will be incorporated into the membership, scope, and process to be used by the working group.

a. Advantages

- Convenes a group to study this topic more in-depth.
- Allows for public and employee input prior to Council consideration
- Citizen review has the potential to provide the Chief of Police with another perspective to consider in rendering decisions about citizen complaints.
- City review has the potential to give an investigation greater credibility than a completely internal review can provide. It also has the potential to reassure the public that citizen complaint investigations are both thorough and fair.
- The implementation of citizen review may provide another avenue for citizens to express their concerns.
- Some forms of citizen review can be implemented in a cost effective manner.
- Can provide new opportunities for public outreach and public education.

b. Disadvantages

- Providing staff support to the working group and potentially a citizen review board will require a commitment of Police resources and staff time.
- Citizen review may not fully resolve community concerns, lack of trust in the Police Department, or lack of confidence in the process.
- The implementation of citizen review will likely have to be negotiated with the Fraternal Order of Police which could delay implementation.
- It may prove difficult to find individuals willing to make the time commitment to conduct complaint investigations and serve on a citizen review board.
- Some forms of citizen review can be costly to implement.
- May be viewed by some police employees as a lack of community support.

Alternative 2. Allows Council to provide other direction to staff on how to address citizen concerns regarding the police complaint process.

a. Advantages

- Would depend upon the direction provided by Council.
- Council may opt for a less time-intensive process prior to deciding whether to pursue citizen review or changes to the complaint process.

b. Disadvantages

- May not allow for additional public input by those who wish to provide it.
- Some members of the community may remain frustrated and continue to lack confidence in the current process.

H. Community Input: The formation of a working group, which will be holding public meetings and be tasked with gathering public input, will allow the public to remain informed and provide the City with the best opportunity to gather input from those who have a vested interest in the process. Broad representation on the working group would ensure broad input and, ultimately, should serve to ensure that those most affected by the process are provided with an opportunity to provide input prior to the initiation of any changes to the process.

I. Budget Impact: If City Council directs the Chief of Police to form a working group to examine the existing complaint process, volunteers will be utilized and costs should be limited to copying materials for the group to review. This will not create a significant budget impact to the Police Department.

Should some form of citizen review be implemented as a result of a recommendation from the working group, it is believed that the budget impact will be minimal as the impact to the City of Urbana's budget has been minimal. However, the actual cost will depend upon the model adopted if some form of citizen review is implemented.

J. Staffing Impact: To date, it is estimated that staff has spent more than 100 hours on research, discussion, and report preparation. Police Administration and other Department employees will likely spend approximately another 100 hours soliciting volunteers, conducting research, preparing reports and other meeting materials, and leading and attending working group meetings.

Should some form of citizen review be implemented as a result of a recommendation from the working group, it is believed that the staffing impact will be minimal as the impact to the City of Urbana's staff has been minimal. However, the actual staffing impact will depend upon the model adopted if some form of citizen review is implemented.

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Attachments: Table Describing the Types and Features of Nine Citizen Oversight Systems

Types and Features of Nine Citizen Oversight Systems

System	Type	Mediation	Subpoena Power
Berkley Police Review Commission	Type 1 Investigative	Yes	Yes
Flint Office of the Ombudsman	Type 1 Investigative	No	Yes, but never used
Minneapolis Civilian Police Review Authority	Type 1 Investigative	Yes	No, but cooperation is required of employee
Orange County Citizen Review Board	Type 2 Advisory	No	Yes, but never used
Portland Police Internal Investigation Auditing Committee	Type 3 Appellate & Type 4 Auditor	No	Yes
Rochester Civilian Review Board	Type 2 Advisory	Yes	No
St. Paul Civilian Internal Affairs Review Commission	Type 2 Advisory	No	Yes, but never used
San Francisco Office of Citizen Complaints	Type 1 Investigative	Yes	Yes
Tucson Independent Police Auditor and Citizen Police Advisory Board	Type 2 Advisory & Type 4 Auditor	No	No