

ACCOUNTABILITY

I. INTRODUCTION

Accountability in law enforcement is positively correlated with public safety because it builds public trust, encourages ethical conduct, and contributes to the public's perception of a law enforcement agency's legitimacy and effectiveness.¹ Civilian oversight agencies can play a significant role in increasing accountability, reducing racial profiling, and, by extension, enhancing public safety.²

This year, the Board builds on its prior discussion of civilian oversight by exploring the impact of civilian oversight agencies (COAs) on racial and identity profiling and public safety. This section begins with an overview of the history of civilian oversight in the United States, common goals of civilian oversight, principles for effective oversight, and four general types or models of COAs, then analyzes how COAs can reduce racial and identity profiling and increase public safety. This section also provides a high-level summary of the COAs that oversee the fifteen largest law enforcement agencies (LEAs) in California and provides recommendations to COAs regarding the use of RIPA data to identify racial and identity and remedy disparities in policing practices.

Finally, this section provides an updated analysis of officer decertification actions under Senate Bill 2 (SB 2), including an analysis of regional differences in SB 2 data and outcomes in California.

II. CIVILIAN OVERSIGHT

Civilian oversight generally refers to the independent review of law enforcement agencies and officers by individuals who are not sworn officers.³ Civilian oversight can take various forms, but the core purposes are to increase accountability, transparency, and public trust in policing; promote thorough, fair investigations; deter police misconduct; and ensure an accessible complaint process.⁴

In general, COAs share common objectives, including:

- Improving public trust in law enforcement;
- Ensuring accessible complaint processes;
- Promoting thorough, fair investigations of police misconduct;
- Increasing transparency and accountability;
- Deterring officers from engaging in misconduct;
- Holding law enforcement agencies accountable for officers' behavior;

¹ See McLendon et al., *Improving Public Safety Through Better Accountability and Prevention* (May 16, 2024) American Progress <<https://tinyurl.com/74vhn9zy>> [as of XX, 2025].

² See Robbins et al., *Promoting Independent Police Accountability Mechanisms: Key Principles for Civilian Oversight of Law Enforcement* (June 2021) Fair and Just Prosecution <<https://tinyurl.com/3thuttb>> [as of XX, 2025].

³ See DeAngelis et al., *Civilian Oversight of Law Enforcement: A Review of the Strengths and Weaknesses of Various Models* (September 2016) NACOLE, p. 3 <<https://tinyurl.com/yb6432xz>> [as of XX, 2025].

⁴ See DeAngelis et al., *Civilian Oversight of Law Enforcement: A Review of the Strengths and Weaknesses of Various Models* (September 2016) NACOLE, p. 3 <<https://tinyurl.com/yb6432xz>> [as of XX, 2025].

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- Promoting systemic changes in law enforcement; and
- Improving community-law enforcement relations and public trust in the complaint process.⁵

Many of these objectives correlate with reductions in racial and identity disparities in policing and with increased public safety.⁶

The Board undertakes this detailed review of civilian oversight and its historical roots to assess how COAs can address civilian complaints relating to racial and identity bias and profiling and mitigate such practices through systemic reforms.

A. Emergence of Civilian Oversight Agencies

The first law enforcement oversight bodies took the form of internal police commissions, which were implemented by Progressive Era reformers in the late 19th and early 20th centuries.⁷ These commissions were designed to combat the political power that local political bosses had over police agencies, and not to address systemic issues of inequality in policing at the time.⁸ As a result, most early commissions failed to provide meaningful oversight of local police departments, in part because commission members were political appointees, had little expertise in policing, and tended to become highly deferential to police executives when proposing or implementing reforms.⁹

⁵ See De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, pp. 33-34 <<https://tinyurl.com/466spbnv>> [as of XX, 2025], citing Walker, *Police Accountability: The Role of Citizen Oversight* (2001) p. 55; Finn, *Citizen Review of the Police: Approaches and Implementation*, Office of Justice Programs (2001) National Institute of Justice, pp. 6-11 <<https://www.ojp.gov/pdffiles1/nij/184430.pdf>>; Bobb, *Civilian Oversight of the Police in the United States* (2003) 22 St. Louis Univ. Public Law Rev. 1 <<https://tinyurl.com/36brtmd6>>; Harris, *Holding Police Accountability Theory to Account* (2012) 6 Policing 3, 240-249 <https://pure.port.ac.uk/ws/portalfiles/portal/5923004/DcrimJ_Thesis_Harris_220513.pdf>; Attard and Olson, *Oversight in the United States* (2013); King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015) <<https://tinyurl.com/3ys7arza>>; Prenzler, “Democratic Policing, Public Opinion and External Oversight” in *Civilian Oversight of Police: Advancing Accountability in Law Enforcement* (Prenzler and den Heyer, eds., 2016); Alpert et al., “Citizen Oversight in the United States and Canada: Applying Outcome Measures and Evidence-Based Concepts” in *Civilian Oversight of Police: Advancing Accountability in Law Enforcement* (Prenzler and den Heyer, eds., 2016) pp. 179-204; NACOLE Presentation, *Civilian Oversight of Law Enforcement, Its Principles and Role* (Sept. 10, 2020) <<https://tinyurl.com/mr39ffzd>> [as of XX, 2025].

⁶ See Ali & Nicholson-Crotty, *Examining the Accountability-Performance Link: The Case of Citizen Oversight of Police*, (2020) 44 Public Performance & Management Review, 44(3)3 (2020) pp. 7, 22 <<https://tinyurl.com/2r965v6y>> [as of XX, 2025].

⁷ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE p. 6 <<https://tinyurl.com/466spbnv>> [as of XX, 2025], citing Police Assessment Resource Center (PARC), *Review of National Police Oversight Models for the Eugene Police Commission* (2005), pp. 4-5 <<https://tinyurl.com/xrfb7bpy>>; Walker, *A Critical History of Police Reform: The Emergence of Professionalism*, (1977); Walker, *Police Accountability: The Role of Citizen Oversight* (2001).

⁸ See De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 6 <<https://tinyurl.com/466spbnv>> [as of XX, 2025].

⁹ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 6 <<https://tinyurl.com/466spbnv>> [as of XX, 2025], citing Walker, *Police Accountability: The Role of Citizen*

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Over time, the composition, function, and resources of COAs evolved to respond to those concerns about policing that were reflective of the time, such as the enduring racial tensions in the 1930s and 1950s, where race relations and police violence sparked urban riots; the Civil Rights Movement of the 1960s; and subsequent protests over police treatment of African Americans through the 1980s.¹⁰ By the 1990s, a new model of civilian oversight began to take shape, focused on systemic issues in law enforcement policies and procedures.¹¹ For example, in 1991, the Seattle City Council established an independent civilian auditor to audit and review civilian complaint investigations. Two years later, the San Jose City Council proactively approved an ordinance creating an Independent Police Auditor, who was authorized to review the complaint investigations completed by the San Jose Police Department (SJPd), analyze complaint trends and statistics, and review and recommend improvements to SJPd policies and procedures.¹²

As before, the composition, function, and resources of COAs continue to evolve. This section examines how modern COAs function within California and how they can use RIPA data to monitor and reduce identity group disparities in policing.

B. Modern Types of COAs

Although there is a high amount of variation in the structure and authority of COAs in the United States, researchers have classified civilian oversight into three primary models based on their core agency functions: the Investigative Model, the Auditor/Monitor Model (Auditor Model), and the Review Model.¹³ Some COAs may be a hybrid of these three models. This section analyzes the strengths and limitations of each model, including their potential to eliminate racial and identity disparities in law enforcement outcomes.

1. Investigative Model

Investigative COAs investigate complaints against law enforcement agencies to assess whether those complaints establish police misconduct, and generally, they operate separately from law enforcement.¹⁴ These COAs generally employ professionally trained investigative staff, and may consist of a volunteer board or commission.¹⁵ Although the structure, resources, and authority of investigative COAs may vary, these COAs generally have the ability to conduct investigations of

Oversight (2001), Bobb, *Civilian Oversight of the Police in the United States* (2003) 22 St. Louis Univ. Public Law Rev. 1, 4 <<https://tinyurl.com/36brtmd6>>; Attard and Olson, *Oversight in the United States* (2013).

¹⁰ Vitoroulis et al., *The Evolution and Growth of Civilian Oversight* (2021) Community Oriented Policing Serv., pp. 4-5 <<https://tinyurl.com/4m2hape6>> [as of XX, 2025]; De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 7 <<https://tinyurl.com/466spbnv>> [as of XX, 2025].

¹¹ Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 5 <<https://tinyurl.com/4m2hape6>> [as of XX, 2025].

¹² See Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at pp. 5-7; De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 6.

¹³ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, pp. 22-24 <<https://tinyurl.com/466spbnv>> [as of XX, 2025] (consolidating research).

¹⁴ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 24 <<https://tinyurl.com/466spbnv>> [as of XX, 2025].

¹⁵ NACOLE, Models of Civilian Oversight of Law Enforcement <https://www.nacole.org/models_of_oversight>; De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence* (Sept. 2016) NACOLE, pp. 24-25 <<https://tinyurl.com/466spbnv>> [as of XX, 2025]; Vitoroulis et al., *Civilian Oversight of Law Enforcement: Report on the State of the Field & Effective Oversight*, *supra*, note X, at pp. 19-20.

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alleged misconduct by officers independently of, and sometimes replacing the function of, the LEA's internal affairs unit.¹⁶ Investigative COAs may serve as the intake point for public complaints against officers; review and classify civilian complaints; subpoena documents and witnesses; conduct independent interviews of complainants, officers, and witnesses; and issue findings to LEAs.¹⁷ They may also have the authority to recommend and/or impose discipline of officers and generally have greater access to law enforcement records and databases than review-focused COAs.¹⁸

a. Potential Key Strengths

Investigative COAs with trained staff can complete thorough and impartial investigations and are the most independent forms of oversight.¹⁹ Investigative COAs also tend to have greater resources and larger staff than other types of oversight, and their investigative staff are likely to have had highly specialized training.²⁰

Investigation-focused models also have the ability to increase public faith in the integrity of the investigation process.²¹ Most investigation-focused COAs utilize civilian staff to conduct fact-finding investigations and operate a multi-member community board that may hold hearings, issue findings and/or make recommendations to the LEA.²² As a result, this model may reassure a community that investigations are unbiased and thorough and that civilian perspectives are represented both within the complaint investigation process and upon review of completed investigations.²³

¹⁶ NACOLE, Models of Civilian Oversight of Law Enforcement <https://www.nacole.org/models_of_oversight> [as of XX, 2025]; De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 24, citing Finn, *Citizen Review of the Police: Approaches and Implementation* (2001) National Institute of Justice <<https://www.ojp.gov/pdffiles1/nij/184430.pdf>>; PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>; Vitoroulis et al., *Civilian Oversight of Law Enforcement: Report on the State of the Field & Effective Oversight*, *supra*, note X, at p. 19.

¹⁷ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 25, citing Bobb, *Civilian Oversight of the Police in the United States* (2003) 22 St. Louis Univ. Public Law Rev. 1 <<https://tinyurl.com/36brtmd6>>; King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015) <<https://tinyurl.com/3ys7arza>>; Attard and Olson, *Oversight in the United States* (2013).

¹⁸ See De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, pp. 68-69; Vitoroulis et al., *Civilian Oversight of Law Enforcement: Report on the State of the Field & Effective Oversight*, *supra*, note X, at p. 20.

¹⁹ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 25, citing Prenzler and Ronken, *Models of Police Oversight: A critique* (May 2001) 11 Policing and Society 2, 151-180 <<https://tinyurl.com/2bmez7uj>> [as of XX, 2025]; PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>; Walker, *Police Accountability: The Role of Citizen Oversight* (2001).

²⁰ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 25.

²¹ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 25.

²² De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 25.

²³ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 25, citing PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) p. 11 <<https://tinyurl.com/xrfb7bpy>>.

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b. Potential Key Limitations

Investigative COAs are more organizationally complex and expensive than other forms of oversight.²⁴ They require significant resources to conduct timely and thorough investigations, including professionally trained staff.²⁵ However, as discussed in section II.D. below, one of the most important potential indicators of effectiveness is the available resources of a COA, and the higher cost of the investigative COA can be mitigated by the reduction in personnel needed to conduct internal LEA investigations.²⁶

Another potential limitation is that investigative COAs may face strong resistance from law enforcement personnel and police unions.²⁷ Over the years, some unions have argued that civilian investigators lack the professional experience and technical skills to investigate complex misconduct claims.²⁸ Likewise, some unions have also opposed full investigatory oversight, claiming the agencies would be biased against officers.²⁹ Some researchers have also argued that, while the public may have confidence in the full investigative model initially, the public may become disillusioned over time if community expectations for reform, such as more sustained complaints and stronger punishment, are not met.³⁰

c. Investigative Model's Correlation with the Reduction of Racial and Identity Disparities in Law Enforcement

Research indicates that investigative COAs may be associated with reductions in racial and identity profiling. For example, one study found that investigative COAs are positively associated with reductions in racial disparities in disorderly conduct arrests and police homicides of civilians.³¹ The same study found that those investigative COAs correlated with such reductions in racial disparities tended to have the same qualities indicative of a robust, independent COA—for example, the authority to conduct investigations independently, make investigation findings, and recommend discipline—and had full-time staff with adequate

²⁴ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence* *supra*, note X, at pp. 25-26.

²⁵ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at pp. 25-26.

²⁶ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at pp. 25-26.

²⁷ King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015) 12 Hastings Race and Poverty L.J. 1, 100 <<https://tinyurl.com/3ys7arza>> [as of XX, 2025].

²⁸ Prenzler and Ronken, *Models of Police Oversight: A critique* (May 2001) 11 Policing and Society 2, 167-168 <<https://tinyurl.com/2bmez7uj>> [as of XX, 2025].

²⁹ King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015) 12 Hastings Race and Poverty L.J. 1, 100 <<https://tinyurl.com/3ys7arza>> as of [XX, 2025].

³⁰ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 26, citing McDevitt et al., *Enhancing Citizen Participation in the Review of Complaints and the Use of Force in the Boston Police Department* (2005) Institute on Race and Justice, Northeastern University, p. 5 <<https://tinyurl.com/bdh7far7>> [as of XX, 2025].

³¹ Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police* (2019) 79 Public Admin. Rev. 3, 416, 421, 422.

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budgets.³² Investigative COAs may also correlate with increased public safety, as they are associated with a reduction in violent crime rates and homicides of police officers.³³

2. Auditor Model

In general, auditor COAs focus on promoting large-scale systemic reform of LEAs by conducting systematic reviews of LEA policies, practices, or training, and making recommendations for improvement.³⁴ These COAs are sometimes referred to as inspectors general or police monitors.³⁵

Auditor COAs are generally authorized to audit, monitor, investigate, and review a wide range of law enforcement policies, practices, and procedures, including the LEA's complaint investigation process.³⁶ Rather than focusing on reviewing or investigating individual complaints, they review broad patterns in complaints and focus on examining broad patterns in complaint investigations, including patterns in the quality of investigations, findings, and discipline.³⁷ Some auditor COAs may actively participate in or monitor open internal investigations.³⁸

a. Potential Key Strengths

Given their focus on organizational reform, auditor COAs often have more robust reporting practices than other types of oversight.³⁹ Since they tend to focus on reviewing patterns in complaints, they may also have more access to LEA records, case files, and electronic databases than review-focused COAs.⁴⁰

Auditor COAs may also be more effective at promoting long-term, systemic change in LEAs because they can focus on broader trends and patterns in complaints and make public

³² Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police*, *supra*, note X, at p. 34.

³³ Ali and Nicholson-Crotty, *Examining the Accountability-Performance Link: The Case of Citizen Oversight of Police* (2020) 44 Public Performance & Management Review 3, 22 <<https://tinyurl.com/2r965v6y>> [as of XX, 2025].

³⁴ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, p. 30, citing Walker and Archbold, *The New World of Police Accountability* (2014); Olson and Attard, *Analysis of Police Oversight Models for the City of Pasadena* (2016) Change Integration Consulting, LLC, pp. 18-20 <<https://tinyurl.com/mbsh8fst>>.

³⁵ NACOLE, *Models of Civilian Oversight of Law Enforcement*, *supra*, note X; De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 29.

³⁶ NACOLE, *Civilian Oversight of Law Enforcement, Accessing the Evidence*, p. 30.

³⁷ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at pp. 30-31.

³⁸ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 30, citing King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015) 12 Hastings Race and Poverty L.J. 1, 102 <<https://tinyurl.com/3ys7arza>> [as of XX, 2025].

³⁹ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 30, citing Walker and Archbold, *The New World of Police Accountability* (2014).

⁴⁰ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 30, citing McDevitt et al., *Enhancing Citizen Participation in the Review of Complaints and the Use of Force in the Boston Police Department* (2005) Institute on Race and Justice, Northeastern Univ., p. 6 <<https://tinyurl.com/bdh7far7>>; Olson and Attard, *Analysis of Police Oversight Models for the City of Pasadena* (2016) Change Integration Consulting, LLC <<https://tinyurl.com/mbsh8fst>>.

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recommendations for improvement.⁴¹ These COAs also have the ability to track whether LEAs have implemented their recommendations and whether those recommendations have resulted in organizational improvement over time.⁴² In cases where an LEA does not implement the COA's recommendations, the auditor COA can use its public reporting function to inform the public and policy makers about the LEA's decision.⁴³

Auditor COAs are also often less expensive than investigative COAs, although they are still more expensive than review-focused COAs.⁴⁴

b. Potential Key Limitations

Because auditor COAs focus on examining broad patterns in complaints rather than individual complaints, those who want discipline to be imposed in specific cases of officer misconduct may oppose this model of civilian oversight.⁴⁵

Additionally, to achieve long-term reform, an auditor COA may reach compromises on individual cases with LEA officials to ensure a long-term relationship is developed between agencies.⁴⁶ In some cases, an auditor COA may choose to allow the LEA executive to take credit for the reform initiative to maintain long term relationships with LEA leadership.⁴⁷ While these actions may ultimately support positive reform, there may be a lack of understanding by the community as to the effectiveness of the oversight.⁴⁸

Another potential limitation of auditor models is that conducting broad, systematic policy evaluations requires significant expertise, and their effectiveness is dependent on the quality of staff hired to do the work.⁴⁹

c. Auditor Model's Correlation with the Reduction of Racial and Identity Disparities in Law Enforcement

Researchers have found that the existence of an auditor COA is not correlated with a reduction in racial disparities in law enforcement actions where the officer has a low degree of discretion, such as in officer homicides of civilians.⁵⁰ However, in high-discretion enforcement actions,

⁴¹ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 31.

⁴² De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 31.

⁴³ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 32.

⁴⁴ NACOLE, *Models of Civilian Oversight of Law Enforcement*, *supra*, note X.

⁴⁵ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 31, citing Walker and Archbold, *The New World of Police Accountability* (2014).

⁴⁶ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 31.

⁴⁷ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 31.

⁴⁸ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 31.

⁴⁹ De Angelis et al., *Civilian Oversight of Law Enforcement, Accessing the Evidence*, *supra*, note X, at p. 32, citing Walker and Archbold, *The New World of Police Accountability* (2014).

⁵⁰ Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police*, *supra*, note X, at p. 421. Researchers note that homicides of civilians, and particularly homicides with the use of a firearm, are "low discretion" actions because they "are almost guaranteed to attract scrutiny from internal accountability mechanisms and/or a COA." (*Id.* at pp. 414-415; see also Cordner and Scott, *Police Discretion and Its Control* in *Encyclopedia of Criminology and Criminal Justice* (Bruinsma and Weisburd, eds., 2014), pp. 3875-3895; Fallik and Novak, *Biased Policing* in *Encyclopedia of Criminology and Criminal Justice* (Bruinsma and Weisburd, eds., 2014) pp. 154-162.)

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such as disorderly conduct arrests,⁵¹ auditor COAs (like investigative COAs) are positively associated with a reduction in racial disparities in policing.⁵² Researchers have found that COAs that have a greater amount of oversight with broader authority (such as investigative COAs) are associated with reductions in racial disparities in low-discretion interactions like police homicide of citizens, and COAs with less oversight and authority (such as auditor COAs) are not associated with those reductions in low-discretion events.⁵³ Even so, given the high volume of discretionary stops that occur, such as officer-initiated traffic and pedestrian encounters, the auditor model's association with reduced racial disparities in high-discretion encounters is significant.⁵⁴

3. Review Model

Review-focused COAs are the most common type of COA in the United States.⁵⁵ The review model generally focuses on reviewing the quality of an LEA's internal investigations.⁵⁶ These COAs provide community members who are unaffiliated with the LEA an opportunity to review the quality of misconduct investigations performed by the LEA.⁵⁷ Review-focused COAs may make recommendations to law enforcement executives regarding findings or request that further investigation be conducted.⁵⁸ They are commonly composed of citizen volunteers and hold

⁵¹ Researchers note that such actions are “high discretion because of their routine nature, which makes them less likely to attract scrutiny from the public, police supervisors, or a COA.” Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police* (2019) 79 Public Admin. Rev. 3, 414.

⁵² Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police*, *supra*, note X, at p. 422 [“the greater the discretionary authority that [law enforcement officers] have, the greater the likelihood for bias to permeate their decisions”]; Spencer et al., *Implicit Bias and Policing* (2016) Social and Personality Psychology Compass 10/1, 54, 59 <<https://tinyurl.com/2k2jwb78>> [as of XX, 2025].

⁵³ Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police*, *supra*, note X, at p. 31. In contrast to the high-discretion event of disorderly conduct, police homicides of civilians are “low discretion” events, as “police officers’ discretionary authority in using deadly force against citizens is checked by internal and external accountability mechanisms,” including the legal restrictions imposed by cases such as *Tennessee v. Garner* (1985) 471 U.S. 1, which prohibits police officers from using deadly force against fleeing suspects unless the officer has probable cause to believe that the suspect poses a significant threat of death or physical injury to the officer or to others. Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police* (2019) 79 Public Admin. Rev. 3, 414-415.

⁵⁴ Ramirez et al., *A Resource Guide on Racial Profiling Data Collection Systems: Promising Practices and Lessons Learned* (Nov. 2000) U.S. Dept. of Justice, pp. 9-10 [“officers have a wide discretion in selecting which cars to stop.”], p. 10 [high-discretion pedestrian stops involve those who may look suspicious but are not engaged in any specific criminal violation or activities] <<https://tinyurl.com/486rhfzn>> [as of XX, 2025]; Grine and Coward, “Police Investigation: Stops, Searches, and Arrests” in *Raising Issues of Race in North Carolina Criminal Cases* (Sept. 2014) pp. 2-24 [“Since violations of the traffic laws are commonplace, police have enormous discretion to effectuate stops of a very high number of cars”] <<https://tinyurl.com/5a93trty>> [as of XX, 2025].

⁵⁵ NACOLE, *Models of Civilian Oversight of Law Enforcement*, *supra*, note X.

⁵⁶ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at pp. 27-28.

⁵⁷ NACOLE, *Models of Civilian Oversight of Law Enforcement*, *supra*, note X.

⁵⁸ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 28, citing PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) p. 8 <<https://tinyurl.com/xrfb7bpy>>.

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public meetings to collect community input and facilitate law enforcement-community communication.⁵⁹

a. Potential Key Strengths

Review-focused COAs have several strengths, including ensuring that the community has the ability to provide input into the complaint investigation process, which may increase public trust in the complaint process.⁶⁰ Review-focused COAs are also generally the least expensive form of civilian oversight since they typically rely on the work of volunteers rather than paid staff members.⁶¹

b. Potential Key Limitations

Since review-focused COAs typically address individual case investigations, their ability to promote broad systemic organizational changes may be limited.⁶² Additionally, these COAs tend to have limited authority and few organizational resources.⁶³ Review board volunteers may have significantly less expertise in law enforcement issues and limited time to perform their work.⁶⁴ Review-focused COAs also tend to have a smaller budget and may be more appropriate for smaller jurisdictions with a small budget.⁶⁵ These COAs also tend to report to the head of the LEA, meaning they may also be less independent from other forms of oversight.⁶⁶

⁵⁹ DeAngelis et al., *Civilian Oversight of Law Enforcement: A Review of the Strengths and Weaknesses of Various Models* (September 2016) NACOLE, p. 9 <<https://tinyurl.com/yb6432xz>> [as of XX, 2025], citing PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>.

⁶⁰ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X at p. 28, citing Finn, *Citizen Review of the Police: Approaches and Implementation* (2001) National Institute of Justice <<https://www.ojp.gov/pdffiles1/nij/184430.pdf>>; Attard and Olson, *Oversight in the United States* (2013); Walker, *Police Accountability: The Role of Citizen Oversight* (2001).

⁶¹ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at pp. 28-29, citing PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>.

⁶² De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 29, citing Walker, *Police Accountability: The Role of Citizen Oversight* (2001); PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>.

⁶³ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, , at pp. 28-29.

⁶⁴ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at pp. 28-29.

⁶⁵ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 29, citing Walker, *Police Accountability: The Role of Citizen Oversight* (2001); PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>; Olson, *Citizen Advisory/Review Board Spokane County Sheriff's Office: Oversight Review* (2016) Change Integration Consulting, LLC <<https://www.spokesman.com/documents/2016/may/16/spokane-county-sheriffs-office-citizen-advisory-bo/>> [as of XX, 2025].

⁶⁶ De Angelis et al., *Civilian Oversight of Law Enforcement, Assessing the Evidence*, *supra*, note X, at p. 29, citing Walker, *Police Accountability: The Role of Citizen Oversight* (2001); PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>; Olson, *Citizen Advisory/Review Board Spokane County Sheriff's Office: Oversight Review*, Change Integration Consulting, LLC (2016) <<https://www.spokesman.com/documents/2016/may/16/spokane-county-sheriffs-office-citizen-advisory-bo/>> [as of XX, 2025].

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c. Review Model’s Correlation with the Reduction of Racial and Identity Disparities in Law Enforcement

Like auditor COAs, review-focused COAs may correlate with a decrease in racial disparities in high-discretion interactions, such as disorderly conduct arrests. Specifically, one study found that COAs with a board composed of citizens appointed by a municipal district, which can include review-focused COAs, reduced the racial disparity in disorderly conduct arrests by as much as 41 percent.⁶⁷

But, also like auditor COAs, review-focused COAs did not reduce racial disparities in police homicides of citizens to a statistically significant level.⁶⁸ This correlation of review-focused COAs to decreased racial disparities in high-discretion interactions remains significant because of the volume of officer-initiated traffic and pedestrian stops in the state, which are often high-discretion interactions.⁶⁹

C. Civilian Oversight in California

This section provides an overview of civilian oversight for the fifteen largest LEAs in California. Many of these COAs already have the infrastructure and tools to address racial and identity disparities in their LEA’s policing practices. These COAs can further strengthen their existing models by using RIPA data to develop and propose updated policies and practices that can help reduce racial and identity disparities and increase public safety.

1. Wave 1 and 2 Agencies

Five of the eight Wave 1 LEAs in California have formal, independent COAs. These five COAs use a hybrid of the three primary COA models.⁷⁰ All Wave 2 law enforcement agencies have COAs, which can be categorized as the Review Model, Audit/Monitor Model, or a hybrid of these. No Wave 2 COAs employ the Investigative Model.

⁶⁷ Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police* (2019) 79 Public Admin. Rev. 3, p. 422.

⁶⁸ Ali and Pirog, *Social Accountability and Institutional Change: The Case of Citizen Oversight of Police* (2019) 79 Public Admin. Rev. 3, p. 422.

⁶⁹ Ramirez et al., *A Resource Guide on Racial Profiling Data Collection Systems: Promising Practices and Lessons Learned* (Nov. 2000) U.S. Dept. of Justice, pp. 9-10 [“officers have a wide discretion in selecting which cars to stop.”], p. 10 [high-discretion pedestrian stops involve those who may look suspicious but are not engaged in any specific criminal violation or activities] <<https://tinyurl.com/486rhfzn>> [as of XX, 2025]; Grine and Coward, “Police Investigation: Stops, Searches, and Arrests” in *Raising Issues of Race in North Carolina Criminal Cases* (Sept. 2014) pp. 2-24 [“Since violations of the traffic laws are commonplace, police have enormous discretion to effectuate stops of a very high number of cars”] <<https://tinyurl.com/5a93trty>> [as of XX, 2025].

⁷⁰ For purposes of this report, a COA is classified as investigative only if it conducts independent investigations of civilian complaints or actions of individual peace officers.

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Table X: Civilian Oversight of Waves 1 and 2 Law Enforcement Agencies

Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
Wave 1					
California Highway Patrol	No formal, independent COA	✗	✗	✗	✗
Los Angeles County Sheriff's Department (LASD)	Sheriff Civilian Oversight Commission ⁷¹ (COC)	✗	✗	✓ ⁷²	✗
	Office of Inspector General, County of Los Angeles (LASD OIG) ⁷³	✗	✗ ⁷⁴	✓ ⁷⁵	✗
Los Angeles Police Department (LAPD)	Board of Police Commissioners (BOPC) ⁷⁶	✗	✗	✗	✗
	Office of the Inspector General (LAPD OIG) ⁷⁷	✗	✓ ⁷⁸	✓ ⁷⁹	✗

⁷¹ Sheriff Civilian Oversight Commission, County of Los Angeles <<https://coc.lacounty.gov/>> [as of XX, 2025].

⁷² COC may direct LASD OIG to issue subpoenas on COC's behalf. Los Angeles County Code, § 3.79.032.

⁷³ Office of the Inspector General, Los Angeles Police Commission <<https://www.oig.lacity.org/>> [as of XX, 2025].

⁷⁴ It may only investigate matters involving LASD, its employees, or others regarding matters within the authority of the COC or Probation Oversight Commission (POC) under certain specified conditions. Los Angeles County Code, § 6.44.190.

⁷⁵ Los Angeles County Code, § 6.44.190.

⁷⁶ Los Angeles Police Department, Police Commission <<https://www.lapdonline.org/police-commission/>> [as of XX, 2025].

⁷⁷ Office of the Inspector General, Los Angeles Police Commission <<https://www.oig.lacity.org/>> [as of XX, 2025].

⁷⁸ Los Angeles Police Department, Police Commission <<https://www.lapdonline.org/police-commission/>> [as of XX, 2025].

⁷⁹ Office of the Inspector General, About Us <https://www.oig.lacity.org/about-us> [as of XX, 2025].

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Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
Riverside County Sheriff's Department	No formal, independent COA	✗	✗	✗	✗
San Bernardino County Sheriff's Department	No formal, independent COA	✗	✗	✗	✗
San Diego County Sheriff's Department (SDSD)	Citizens Law Enforcement Review Board (CLERB) ⁸⁰	✓ ⁸¹	✓ ⁸²	✓ ⁸³	✓ ⁸⁴
San Diego Police Department (SDPD)	Commission on Police Practices (CPP) ⁸⁵	✓ ⁸⁶	✓ ⁸⁷	✓ ⁸⁸	✓ ⁸⁹

⁸⁰ Citizens Law Enforcement Review Board <<https://www.sandiegocounty.gov/content/sdc/clerb.html>> [as of XX, 2025].

⁸¹ Citizens Law Enforcement Review Board, About, <https://www.sandiegocounty.gov/content/sdc/clerb/about/> [as of XX, 2025].

⁸² Notably, CLERB's scope is limited; it has the authority to investigate all incidents involving the discharge of a firearm, use of force resulting in great bodily injury, and the use of force at protests or other events, but not other agency actions. San Diego County Code, § 340.9, subd. (b).

⁸³ San Diego County Code, § 340.11.

⁸⁴ San Diego County Code, § 340.11.

⁸⁵ The City of San Diego, Commission on Police Practices <<https://www.sandiego.gov/cpp>> [as of XX, 2025]

⁸⁶ CPP is required to receive and evaluate all complaints, except where the complainant requests that the Commission not investigate, or where there is no specified allegation/officer. San Diego Mun. Code, § 26.1107, subd. (a)(4).

⁸⁷ CCP is required to independently investigate all custody deaths; deaths resulting from officer interaction, and all City police officer-related shootings, and make findings. San Diego Mun. Code, § 26.1107, subd. (a)(2). CCP also has authority to investigate/evaluate complaints that do not involve custody deaths, deaths resulting from officer interaction, or officer-related shootings San Diego Mun. Code, § 26.1107, subd. (a)(3).

⁸⁸ San Diego Mun. Code § 26.1110.

⁸⁹ San Diego Mun. Code, §26.1107, subd. (a)(2); San Diego Mun. Code, § 26.1107, subd. (a)(6).

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Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
San Francisco Police Department (SFPD)	San Francisco Police Commission (Police Commission) ⁹⁰	✗	✗	✗	✓ ⁹¹
	Department of Police Accountability (DPA) ⁹²	✓ ⁹³	✓ ⁹⁴	✓ ⁹⁵	✓ ⁹⁶
Wave 2					
Fresno Police Department	Fresno Commission for Police Reform ⁹⁷	✗	✗	✗	✗ ⁹⁸
	Fresno Office of Independent Review (OIR) ⁹⁹	✗	✗	✗	✗ ¹⁰⁰

⁹⁰ SF.gov, Police Commission <<https://www.sf.gov/departments--police-commission>> [as of XX, 2025].

⁹¹ SF.gov, About the Police Commission, <<https://www.sf.gov/departments--police-commission--about>> [as of XX, 2025].

⁹² SF.gov, Department of Police Accountability <<https://www.sf.gov/departments--department-police-accountability>> [as of XX, 2025].

⁹³ SF.gov, Investigation Division, <<https://www.sf.gov/departments--department-police-accountability--investigation-division>> [as of XX, 2025].

⁹⁴ SF.gov, Investigation Division, <<https://www.sf.gov/departments--department-police-accountability--investigation-division>> [as of XX, 2025].

⁹⁵ SF.gov, Investigation Division, <<https://www.sf.gov/departments--department-police-accountability--investigation-division>> [as of XX, 2025].

⁹⁶ SF.gov, Investigation Division, <<https://www.sf.gov/departments--department-police-accountability--investigation-division>> [as of XX, 2025].

⁹⁷ City of Fresno, Mayor, City Council Announce Members of New Police Reform Commission <<https://www.fresno.gov/news/mayor-city-council-announce-members-of-new-police-reform-commission/>> [as of XX, 2025].

⁹⁸ City of Fresno Commission on Police Reform, Bylaws, <<https://tinyurl.com/4ayt83hm>> [as of XX, 2025].

⁹⁹ City of Fresno, Office of Independent Review, <<https://www.fresno.gov/citymanager/office-of-independent-review/>> [as of XX, 2025].

¹⁰⁰ City of Fresno, Office of Independent Review <<https://www.fresno.gov/citymanager/office-of-independent-review/#review-overview>> [as of XX, 2025].

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Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
Long Beach Police Department	Long Beach Office of Police Oversight ¹⁰¹	✗	✓ ¹⁰²	✗	✗
	Long Beach Police Oversight Commission ¹⁰³	✗	✗	✗	✗ ¹⁰⁴

¹⁰¹ City of Long Beach, Office of Police Oversight <<https://www.longbeach.gov/policeoversight/>> [as of XX, 2025].

¹⁰² It should be noted that the Long Beach Office of Police Oversight can independently investigate complaints only against the Chief of Police and command staff as requested by the City Manager. Long Beach Office of Police Oversight, What We Do <<https://www.longbeach.gov/policeoversight/about-us/>> [as of XX, 2025].

¹⁰³ City of Long Beach, Office of Police Oversight <<https://www.longbeach.gov/policeoversight/commission/>> [as of XX, 2025].

¹⁰⁴ Long Beach Office of Police Oversight, Police Oversight Commission <<https://www.longbeach.gov/policeoversight/commission/>> [as of XX, 2025].

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Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
Oakland Police Department	Oakland Office of Inspector General ¹⁰⁵	✗	✗	✗	✗ ¹⁰⁶
	Oakland Police Commission ¹⁰⁷	✗	✗	✗	✓ ¹⁰⁸
	Oakland Community Police Review Agency (CPRA) ¹⁰⁹	✓ ¹¹⁰	✓ ¹¹¹	✓ ¹¹²	✓ ¹¹³

¹⁰⁵ City of Oakland, Inspector General <<https://www.oaklandca.gov/Government/Departments/Inspector-General>> [as of XX, 2025].

¹⁰⁶ City of Oakland, About the OIG <<https://www.oaklandca.gov/Government/Departments/Inspector-General/About-the-OIG>> [as of XX, 2025].

¹⁰⁷ City of Oakland, Community Police Review Agency <<https://www.oaklandca.gov/Government/Departments/Community-Police-Review-Agency>> [as of XX, 2025]; Measure 86333 <<https://tinyurl.com/yy9tw2yn>> [as of XX, 2025].

¹⁰⁸ Notably, the Oakland Police Commission only has the authority to issue final disciplinary recommendations when the Chief of Police and the investigative agency disagree. City of Oakland Police Commission <<https://www.oaklandca.gov/Government/Boards-Commissions/Police-Commission>> [as of XX, 2025].

¹⁰⁹ City of Oakland, Community Police Review Agency <<https://www.oaklandca.gov/Government/Departments/Community-Police-Review-Agency>> [as of XX, 2025]; <https://www.oaklandca.gov/files/assets/city/v/1/community-police-review-agency-cpra/documents/measure-s1.pdf>

¹¹⁰ City of Oakland, Community Police Review Agency <<https://www.oaklandca.gov/Government/Departments/Community-Police-Review-Agency>> [as of XX, 2025].

¹¹¹ City of Oakland, Community Police Review Agency <<https://www.oaklandca.gov/Government/Departments/Community-Police-Review-Agency>> [as of XX, 2025].

¹¹² CPRA may issue a valid subpoena <[cpra-2020-annual-report.pdf](https://www.oaklandca.gov/Government/Departments/Community-Police-Review-Agency)> [as of XX, 2025].

¹¹³ City of Oakland, Community Police Review Agency <<https://www.oaklandca.gov/Government/Departments/Community-Police-Review-Agency>> [as of XX, 2025].

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Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
Orange County Sheriff Department	Orange County Office of Independent Review (OC OIR) ¹¹⁴	✗	✓ ¹¹⁵	✗ ¹¹⁶	✗ ¹¹⁷
Sacramento County Sheriff's Office	Sacramento Sheriff Community Review Commission (SCRC) ¹¹⁸	✗	✗ ¹¹⁹	✓ ¹²⁰	✗ ¹²¹

¹¹⁴ Orange County Office of Independent Review, Welcome to the Office of Independent Review <<https://oir.ocgov.com/>> [as of XX, 2025].

¹¹⁵ Ord. No. 08-004, § 1, 2-26-08; Ord. No. [15-022](#), § 2, 12-15-15 <<https://tinyurl.com/yz2sr6bt>> [as of XX, 2025].

¹¹⁶ Ord. No. 08-004, § 1, 2-26-08; Ord. No. [15-022](#), § 2, 12-15-15 <<https://tinyurl.com/yz2sr6bt>> [as of XX, 2025].

¹¹⁷ Ord. No. 08-004, § 1, 2-26-08; Ord. No. [15-022](#), § 2, 12-15-15 <<https://tinyurl.com/yz2sr6bt>> [as of XX, 2025].

¹¹⁸ Sacramento County, Sheriff Community Review Commission <<https://sccob.saccounty.gov/Pages/SheriffCommunityReviewCommission.aspx>> [as of XX, 2025].

¹¹⁹ Sheriff Community Review Commission Rules and Regulations (amended March 18, 2025) <https://sccob.saccounty.gov/Documents/CRC/Rules_and_Regulations.pdf> [as of XX, 2025].

¹²⁰ Notably, SCRC can subpoena witness or documents only within the Commission's jurisdiction. Sheriff Community Review Commission Rules and Regulations (amended March 18, 2025) <https://sccob.saccounty.gov/Documents/CRC/Rules_and_Regulations.pdf> [as of XX, 2025].

¹²¹ Sheriff Community Review Commission Rules and Regulations (amended March 18, 2025) <https://sccob.saccounty.gov/Documents/CRC/Rules_and_Regulations.pdf> [as of XX, 2025].

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Law Enforcement Agency	Oversight Agency	Classify Complaints	Independent Investigative Authority of Complaints	Access to Records and Evidence	Make Findings & Recommend Discipline
Sacramento Police Department	Sacramento Office of Public Safety Accountability ¹²² (OPSA)	✓ ¹²³	✗ ¹²⁴	✗ ¹²⁵	✗ ¹²⁶
San Jose Police Department	San Jose Independent Police Auditor ¹²⁷	✗	✗	✗	✗ ¹²⁸

D. Evaluating the Effectiveness of COAs and the Elimination of Racial and Identity Profiling by Law Enforcement

While there is research assessing the effectiveness of a COA in relation to public safety, public trust, and officer accountability for misconduct,¹²⁹ these outcomes often lack standardized

¹²² Office of Public Safety Accountability, Civilian Oversight for Sacramento Police and Fire Department <<https://www.cityofsacramento.gov/opsa/oversight>> [as of XX, 2025].

¹²³ Office of Public Safety Accountability, Civilian Oversight for Sacramento Police and Fire Department <<https://www.cityofsacramento.gov/opsa/oversight>> [as of XX, 2025].

¹²⁴ OPSA specifically tracks and monitors high profile or serious complaint cases to conclusion, reviews completed investigations, and advises the Chief of any deficient investigations. Office of Public Safety Accountability, Civilian Oversight for Sacramento Police and Fire Department <<https://www.cityofsacramento.gov/opsa/oversight>> [as of XX, 2025].

¹²⁵ OPSA specifically tracks and monitors high profile or serious complaint cases to conclusion, reviews completed investigations, and advises the Chief of any deficient investigations. Office of Public Safety Accountability, Civilian Oversight for Sacramento Police and Fire Department <<https://www.cityofsacramento.gov/opsa/oversight>> [as of XX, 2025].

¹²⁶ OPSA specifically tracks and monitors high profile or serious complaint cases to conclusion, reviews completed investigations, and advises the Chief of any deficient investigations. Office of Public Safety Accountability, Civilian Oversight for Sacramento Police and Fire Department <<https://www.cityofsacramento.gov/opsa/oversight>> [as of XX, 2025].

¹²⁷ City of San Jose, Independent Police Auditor, City Charter <<https://tinyurl.com/2s46me4e>> [as of XX, 2025].

¹²⁸ City of San Jose, Independent Police Auditor - About <<https://tinyurl.com/4em4rjnt>> [as of XX, 2025].

¹²⁹ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at pp. 36-44 [listing 12], citing Walker and Archbold, *The New World of Police Accountability* (2014) p. 199; Walker, *Core Principles for an Effective Police Auditor's Office* (2003) Univ. of Nebraska; Attard and Olson, *Overview of Civilian Law Enforcement in the United States* (2013); King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015)¹² Hastings Race and Poverty Law Journal 1, 91-259 <<https://tinyurl.com/3ys7arza>> [as of XX, 2025]; see also Schaible, *Impediments and Challenges to Civilian Oversight of Law Enforcement*, *supra*, note X, at p. 4 [listing 13; interviewing oversight professionals from all COA models regarding the critical components of COAs]; De Angelis et al., NACOLE Report 2016, *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at pp. 64-74 [listing 13].

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definitions and metrics that make it difficult to measure the effectiveness of COAs in reducing racial and identity profiling. The RIPA data can provide such metrics. Thus, the Board encourages COAs to utilize RIPA data, in addition to considering the following principles of effective oversight, to meaningfully address racial disparities in policing.

1. General Principles of Effective COAs

As discussed in the 2023 RIPA Report, NACOLE has identified thirteen principles for effective civilian oversight of law enforcement.¹³⁰ While each of these principles can significantly impact the effectiveness of a COA, several are especially important for a COA to address racial and identity profiling by law enforcement.

a. Independence

Independence refers to the absence of real or perceived influence from law enforcement, political actors, or other special interests.¹³¹ In general, it is crucial for COAs to be structurally, politically, and operationally independent from the LEA they are monitoring in order to be effective and to establish and maintain legitimacy.¹³² In other words, the more independent the COA, the more effective it is in overseeing the LEA.

In the context of RIPA, independence is a critical component of a COA dedicated to the elimination of racial and identity profiling. Recommendations and directions from the COA may necessarily be critical of an LEA's approach to addressing racial and identity disparities in its policing practices. However, a COA that is dependent upon the LEA—for staffing, funding, or resources—may not advance recommendations that criticize the work of the LEA, even if those recommendations are necessary to eliminate profiling. Accordingly, it is crucial that COAs are independent from the LEAs they oversee to effectively address racial and identity profiling.

b. Clearly Defined and Adequate Jurisdiction and Authority

Effective COAs must have adequate and clearly defined jurisdiction and authority to achieve their organizational goals.¹³³ This includes the ability to review allegations of misconduct from all sources, including the review of citizen complaints and the ability to handle and resolve allegations.¹³⁴ Subpoena power and the ability to administer discipline further enhance an agency's effective oversight.¹³⁵

¹³⁰ See Racial and Identity Profiling Advisory Board, Annual Report (2023), p. 170
<<https://oag.ca.gov/system/files/media/ripa-board-report-2023.pdf>> [as of XX, 2025].)

¹³¹ Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 12; see also De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 36.

¹³² De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at pp. 36-37; Vitoroulis, *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 12.

¹³³ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, fn. X at p. 38, citing Attard and Olson, *Overview of Civilian Oversight of Law Enforcement in the United States* (2013); Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 12.

¹³⁴ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 38. Most of the civilian oversight agencies submitting data to NACOLE indicated that they have jurisdiction in relation to citizen complaints. A majority stated that they always or sometimes have jurisdiction in relation to officer-involved shootings, serious force, and in-custody deaths.

¹³⁵ Schaible, *Impediments and Challenges to Civilian Oversight of Law Enforcement*, *supra*, note X, at pp. 6-7.

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A COA dedicated to the elimination of racial and identity profiling must have clearly defined jurisdiction and authority to address and resolve complaints that an agency's practice of profiling is contrary to the law. In the context of RIPA, such authority should include the ability to implement structural policy reforms to eliminate racial and identity profiling, such as limiting officer discretion or eliminating pretextual stops.¹³⁶ Additionally, an effective COA in this space should have the authority to recommend discipline, up to and including decertification, as discussed more fully in Section II, below.

c. Timely and Adequate Access to Records and Facilities

One of the most important components of effective oversight is the ability of the COA to access law enforcement records and facilities,¹³⁷ including access to complaints alleging racial or identity profiling, as this evidence could establish whether an officer has a practice of engaging in profiling or biased conduct. An effective COA has access to law enforcement records (including officer discipline records), facilities (such as detention facilities or testing facilities), and all available evidence (including body-worn camera footage) and uses those records to make factual determinations and resolve allegations of misconduct.¹³⁸

In the context of RIPA, access to the records, facilities, and evidence relating to allegations of biased policing is necessary for COAs to properly assess whether racial and identity profiling occurred. If the COA can demonstrate similar past allegations against the same officers, or even statistical data that indicates identity group disparities in policing by the same officers, a COA can identify a common pattern or practice of impermissible racial or identity profiling and can effectively recommend discipline or policy reforms that promote the elimination of such profiling.

d. Full Cooperation of the Law Enforcement Agency

Cooperation between COAs and LEAs is necessary for the COA to conduct thorough investigations and obtain sufficient information to carry out its work.¹³⁹ COAs may attempt to achieve voluntary cooperation by developing a working relationship with the law enforcement agency they oversee, or jurisdictions may build requirements for cooperation into the COA's enabling ordinance, charter, or statute.¹⁴⁰

¹³⁶ More information on these policy reform proposals can be found in the Policies section of this year's report.

¹³⁷ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 39 <<https://tinyurl.com/466spbnv>> [as of XX, 2025], citing PARC, *Review of National Police Oversight Models for the Eugene Police Commission* (2005) <<https://tinyurl.com/xrfb7bpy>>; Attard and Olson, *Overview of Civilian Oversight of Law Enforcement in the United States* (2013); King, *Effectively Implementing Civilian Oversight Boards to Ensure Police Accountability and Strengthen Police-Community Relations* (2015) <<https://tinyurl.com/3ys7arza>>; Walker, *Core Principles for an Effective Police Auditor's Office* (2003) University of Nebraska; Walker and Archbold, *The New World of Police Accountability* (2014), p. 200; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 13.

¹³⁸ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 39 <<https://tinyurl.com/466spbnv>> [as of XX, 2025]; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 13.

¹³⁹ Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, at note X, at p. 13, citing Walker, *Core Principles for an Effective Police Auditor's Office*.

¹⁴⁰ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, p. 39 <<https://tinyurl.com/466spbnv>> [as of XX, 2025], citing Miller, *Civilian Oversight of Policing: Lessons from the Literature* (2002) Vera Institute of Justice <<https://tinyurl.com/vwahk84s>>.

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A COA dedicated to the elimination of racial and identity profiling requires the full cooperation of the law enforcement agency to which it makes discipline and policy recommendations, particularly where the COA may be critical of an LEA's approach to addressing racial and identity group disparities in its policing practices. A collaborative relationship is necessary for an effective COA because it increases the likelihood that the LEA voluntarily implements the recommended actions, without the need for public pressure or other external motivators.

e. Sustained Stakeholder Support

Sustained and meaningful support from key stakeholders is another important component of effective civilian oversight.¹⁴¹ If not supportive, government officials and office holders can undermine and reduce the effectiveness of civilian oversight in a variety of ways, including by failing to provide the COA with adequate resources or authority or by appointing ineffective managers or board members to the COA.¹⁴²

In the context of RIPA, a COA's sustained and meaningful support from key stakeholders is vital to its effectiveness and capability to resolve complaints. With this sustained support, a COA can better weather institutional and external challenges. Such sustained support is necessary to avoid impairing or delaying the COA's ongoing capacity to audit, investigate, or review investigations or policing trends that implicate identify group profiling.

f. Adequate Funding and Operational Resources

Although no studies have specifically measured the impact that various budgets and staffing have on the effectiveness of oversight, a COA's resources, including adequate budget and staffing, is considered one of the most critical indicators of effectiveness.¹⁴³ If the COA is well-funded, it is more likely to achieve the goals set out for effective oversight.¹⁴⁴ A COA that is

¹⁴¹ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence* (Sept. 2016) NACOLE, pp. 40-41 <<https://tinyurl.com/466spbnv>> [as of XX, 2025]; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 13.

¹⁴² De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, NACOLE (Sept. 2016) pp. 40-41 <<https://tinyurl.com/466spbnv>> [as of XX, 2025], citing Attard and Olson, *Overview of Civilian Oversight of Law Enforcement in the United States* (2013), p. 6; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 13.

¹⁴³ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at pp. 41-42, citing Finn, *Citizen Review of the Police: Approaches and Implementation* (2001) Office of Justice Programs, National Institute of Justice <<https://www.ojp.gov/pdffiles1/nij/184430.pdf>>; Walker, *Police Accountability: The Role of Citizen Oversight* (2001); Walker, *Core Principles for an Effective Police Auditor's Office* (2003) University of Nebraska; Attard and Olson, *Overview of Civilian Oversight of Law Enforcement in the United States* (2013); Olson, *Citizen Advisory/Review Board Spokane County Sheriff's Office: Oversight Review* (2016) Change Integration Consulting, LLC, p. 6 <<https://www.spokesman.com/documents/2016/may/16/spokane-county-sheriffs-office-citizen-advisory-bo/>>; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 14.

¹⁴⁴ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at pp. 41-42; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 41; Thirteen Principles for Effective Oversight, NACOLE <<https://tinyurl.com/2uf5jndb>> [As of XX, 2025].

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professionally staffed by dedicated employees who have the time and expertise to support the work of the COA is also more likely to be effective.¹⁴⁵

An oversight body tasked with eliminating racial and identity profiling cannot succeed without a budget and staff proportional to its responsibilities. In the context of RIPA, under-resourced COAs are unable to conduct timely investigations, perform the systemic reviews of department-wide practices, and sustain the public reporting and community outreach necessary to build trust.

g. Policy and Patterns in Practice Analysis

Analyzing and reporting on law enforcement policies, patterns, and practices in relation to complaint handling processes and outcomes is another critical function of effective oversight to identify inequities, areas for improvement, and to ensure compliance with legal and ethical standards.¹⁴⁶

An oversight body tasked with eliminating racial and identity profiling should avail itself of systematic, comprehensive, and objective data—including RIPA stop and complaint data—to identify disparities, look for patterns by specific officers, investigate biased policing allegations, develop policies and practices intended to improve those outcomes, and to otherwise measure their own efficiency in reducing racial and identity profiling over time.

h. Confidentiality, Anonymity, and Protection from Retaliation

For civilian oversight to be effective, COAs must ensure confidentiality, anonymity, and protection from retaliation for complainants and others who share sensitive information.¹⁴⁷ A fear of retaliation can have a chilling effect on those interested in disclosing misconduct or participating in an investigation.¹⁴⁸

In the context of RIPA, a COA's capacity to ensure confidentiality, anonymity, and protection from retaliation for complainants and others who share sensitive information is pivotal to ensure that persons come forward as victims or witnesses of biased policing. This may also protect officers who wish to report misconduct committed by a colleague, and which would otherwise go undetected.

2. RIPA Data Can Provide a Metric to Evaluate the Effectiveness of COAs in Eliminating Racial and Identity Profiling

The RIPA data is highly relevant to assess a COA's effectiveness in reducing racial and identity profiling in the aggregate of those stops. As an empirical record of all actions taken in police

¹⁴⁵ De Angelis et al, *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at pp. 41-42, citing Finn, *Citizen Review of the Police: Approaches and Implementation* (2001) Office of Justice Programs, National Institute of Justice, p. 6 <<https://www.ojp.gov/pdffiles1/nij/184430.pdf>>; Walker, *Core Principles for an Effective Police Auditor's Office* (2003) University of Nebraska; Olson, *Citizen Advisory/Review Board Spokane County Sheriff's Office: Oversight Review* (2016) Change Integration Consulting, LLC <<https://www.spokesman.com/documents/2016/may/16/spokane-county-sheriffs-office-citizen-advisory-bo/>> [as of XX, 2025]; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 14.

¹⁴⁶ De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 42; Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 14.

¹⁴⁷ Vitoroulis et al., *The Evolution and Growth of Civilian Oversight*, *supra*, note X, at p. 15; see also De Angelis et al., *Civilian Oversight of Law Enforcement: Assessing the Evidence*, *supra*, note X, at p. 44.

¹⁴⁸ See Vitoroulis et al., *The Evolution & Growth of Civilian Oversight*, *supra*, note X, at p. 15.

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stops, RIPA data may provide a standardized and systematic dataset that could be used by COAs to assess and improve policing practices as it relates to racial and identity group bias. Because all LEAs in the state report this data, individual LEAs can conduct comparative analyses across the aggregate to identify high areas of disparity against particular racial and identity groups within their jurisdiction.

For example, the RIPA data distinguishes between officer-initiated stops and those resulting from calls for service. As such, COAs can assess whether certain racial and identity groups are overrepresented in officer-initiated stops compared to their proportion in the population and analyze contraband discovery rates from searches that occur through officer-initiated stops across different racial and identity groups to evaluate for potential disparities in search standards. COAs could also use RIPA data to assess longitudinal and annual trends; trends within the LEA as a whole, by units, and individual officers¹⁴⁹; and compare the LEA-level racial disparities to statewide trends to identify gaps; and seek community input to interpret trends and address them. Additionally, COAs could use the RIPA data, both the reported data and the additional materials in LEAs' possession about encounters that are reported through RIPA, to assess how certain policies effect certain groups.

RIPA's collection of standardized stop data can therefore be used by COAs to identify group disparities, develop systematic reforms, and measure the outcome of those reforms in the LEAs they oversee. A COA that finds racial or identity disparities in their LEA's stop data could issue a recommendation to reduce or eliminate the discretion of officers in these high-discretion interactions—by, for example, eliminating pretextual stops¹⁵⁰—in order to further reduce racial or identity profiling. LEAs and COAs would also benefit from engaging with the RIPA data to assess whether the LEA is properly addressing disparities among different populations and to develop systematic reforms that help reduce racial and identity profiling.

E. Recommendations for Civilian Oversight

As discussed above, COA models that emphasize broad discretion and authority are correlated to a reduction in racial and identity disparities in high-discretion interactions, such as disorderly conduct arrests. RIPA data contains standardized data from California LEAs during vehicle and pedestrian stops, which often involve a high-discretion interactions, particularly for officer initiated stops that do not originate from a call for service.¹⁵¹ As such, RIPA data could and should be used by COAs to assess whether the LEAs are properly addressing and resolving disparities for the various identity groups that RIPA requires LEAs to measure, and to develop systematic reforms in their LEA.

The Board makes the following recommendations related to the use of RIPA data by COAs and LEAs:

¹⁴⁹ This data is in the LEA's possession as information related to incidents reported under RIPA, but is not made public through RIPA reporting.

¹⁵⁰ For more discussion on how the elimination of pretextual stops provides benefits to public safety, please see the Policies section of this year's report.

¹⁵¹ Ramirez et al., *A Resource Guide on Racial Profiling Data Collection Systems: Promising Practices and Lessons Learned* (Nov. 2000), U.S. Dept. of Justice, pp. 9-10 <<https://tinyurl.com/486rhfzn>> [as of XX, 2025]; Grine and Coward, "Police Investigation: Stops, Searches, and Arrests" in *Raising Issues of Race in North Carolina Criminal Cases* (Sept. 2014) pp. 2-9, 23, 24 <<https://tinyurl.com/5a93trty>> [as of XX, 2025]; Doyle and Nembhard, *Police Traffic Stops Have Little to Do with Public Safety* (Apr. 26, 2021) Urban Inst. <<https://tinyurl.com/5b523vey>> [as of XX, 2025].

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1. COAs should explicitly incorporate the elimination of racial and identity profiling as part of efforts to increase public safety.
2. COAs should assess whether they possess the qualities of an effective civilian oversight entity, particularly the features of a robust COA that correlate with the elimination of racial and identity group bias in both high- and low-discretion interactions and expand or implement those factors consistent with their own model.
3. COAs should have contemporaneous and unfettered access to their agency's RIPA data and citizen complaint data in conjunction with other LEA data that allow COAs to match any officer's RIPA data with complaints or matters they are reviewing, both in relation to all vehicle and pedestrian stops and citizen complaints alleging racial and identity profiling, and other information related to the reported data. To the extent that COAs do not already have this access, the authorizing entity should add it to the COAs' scope of authority.
4. COAs should analyze RIPA data to identify any racial and identity disparities in policing practices and, if any exist, propose changes to policies and practices aimed at remedying these disparities and continue to monitor those disparities over time.
5. COAs should develop additional ways to use the RIPA data in a way that is consistent with their model and mission and look for ways to strengthen their existing model.

II. SB 2 PEACE OFFICER DECERTIFICATION

Senate Bill No. 2 (2021-2022 Reg. Sess.) (SB 2), the Kenneth Ross, Jr. Police Decertification Act of 2021,¹⁵² established a statewide system for the suspension or permanent revocation of a peace officer's certification due to serious misconduct, including officers who demonstrate bias or engage in racial and identity profiling. Pursuant to SB 2, the Commission on Peace Officer Standards and Training (POST) reviews and investigates complaints of serious misconduct by officers and suspends or revokes an officer's certification in cases of serious misconduct.¹⁵³ In addition to investigating serious misconduct allegations, SB 2 requires POST to revoke the certification of a peace officer who has become ineligible to hold office because of a criminal conviction listed in Government Code section 1029.¹⁵⁴

The SB 2 decertification process provides statewide public accountability for misconduct. SB 2 process data identifies the reports of misconduct received by POST and how the allegations have been resolved, providing a separate look into how peace officers interact with the public. Particularly relevant to the RIPA Board, information regarding bias in police conduct is tracked with SB 2 data.

Last year, the Board provided an overview of SB 2 and POST's process for decertifying peace officers who are found to have engaged in serious misconduct under SB 2 and analyzed data on

¹⁵² Stats. 2021, c. 409 (S.B.2) eff. Jan. 1, 2022.

¹⁵³ Pen. Code, § 13510.8, subds. (a), (c). The California Law Enforcement Accountability Reform Act ("CLEAR Act") provides for the investigation and adjudication of complaints regarding three categories of misconduct by peace officers: membership in a hate group, participation in a hate group activity, or advocacy of any public expressions of hate. Pen. Code, § 13682; see also, id., § 13680, subds. (d), (e), (g). The rulemaking process to adopt guidelines for the investigation and adjudication of complaints is pending. See Department of Justice, Regulations Implementing the CLEAR Act (AB 655), <<https://oag.ca.gov/ab655/regulations>> [as of XX, 2025].

¹⁵⁴ See Pen. Code, § 13510.8; Cal. Code Regs., tit. 11, § 1212, subd. (a);

POST, *Penal Code § 13512 Annual Report 2023*, at p. 4

<https://post.ca.gov/Portals/0/post_docs/publications/2023_POSAD_Report.pdf> [as of XX, 2025], .

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certification actions initiated by POST against peace officers from January 1, 2023 - October 1, 2024. While this analysis focused on SB 2 data from a statewide- or agency-level perspective, large Southern California agencies appeared to be more represented in SB 2 decertification actions.

This Report provides updated data on certification actions POST has initiated against peace officers since 2023 and incorporates an analysis of regional differences in SB 2 data in California throughout. Additionally, this year's analysis looks separately at Northern and Southern California to better understand if there are regional differences of concern.

A. POST Certification Actions by the Numbers

1. Misconduct Reports

From January 1, 2023, to August 4, 2025, POST received 38,608 misconduct reports from law enforcement agencies, as well as 2,583 public complaints submitted directly to POST. Of the misconduct reports by agencies, 16,672 cases (43.18%) related to an incident that took place prior to January 1, 2023.

As of August 4, 2024, 34,743 cases (90.00%) have been assigned to POST investigators, of which 24,219 cases (62.73%) have been closed.¹⁵⁵ This represents significant progress by POST in closing misconduct report cases since October 2024, when only 7,967 cases (20.64%) had been closed.¹⁵⁶

When POST receives a report, complaint, or other allegation of serious misconduct from an LEA or directly from the public, it classifies the type of serious misconduct alleged into the following basis categories. Because a report can include different types of allegations, the number of allegations (43,958 allegations) is greater than the number of misconduct reports (38,608 reports). As shown in **Figure X** below, of the serious misconduct allegations POST has received between January 1, 2023, and August 4, 2025, physical abuse/excessive force is the most common type of serious misconduct alleged, followed by demonstrating bias, abuse of power, dishonesty, acts that violate the law, and sexual assault.¹⁵⁷

¹⁵⁵ [Pending question to POST]. POST closed cases may also include non-actionable retroactive serious misconduct cases pursuant to Penal Code section 13510.8(g), cases where the evidentiary standard of clear and convincing evidence was not met, and cases that did not meet the statutory definition of serious misconduct pursuant to Penal Code section 13510.8(b). POST, *Penal Code § 13512 Annual Report 2023*, p. 17

<https://post.ca.gov/Portals/0/post_docs/publications/2023_POSAD_Report.pdf> [as of XX, 2025].

¹⁵⁶ See POST, Peace Officer Certification Reporting, <<https://post.ca.gov/Peace-Officer-Certification-Reporting>> [as of XX, 2025].

¹⁵⁷ See POST, Peace Officer Certification Reporting, <<https://post.ca.gov/Peace-Officer-Certification-Reporting>> [as of XX, 2025].

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Figure X. Serious Misconduct Allegations Received by Basis (Up to August 4, 2025)

Basis ¹⁵⁸	Allegations Received ¹⁵⁹	
	Number	Percent
Physical Abuse/Excessive Force	15,983	41.40%
Demonstrating Bias	11,888	30.79%
Abuse of Power	6,732	17.44%
Dishonesty	3,295	8.53%
Acts that Violate the Law	2,969	7.69%
Sexual Assault	1,737	4.50%
Convicted of a Felony	666	1.73%
Other Serious Misconduct	688	1.78%

2. Common Grounds for Certification Actions

As of August 4, 2025, POST has initiated certification actions against 554 peace officers. Actions were spread nearly proportionally between Northern and Southern California,¹⁶⁰ with 289 SB 2 certification actions initiated against 224 officers in Northern California and 289 officers in Southern California. An additional forty-one actions were against peace officers employed by a statewide agency like the California Highway Patrol or the California Department of Justice. 186 of the 554 proceedings against a peace officer implicated the officer's eligibility for peace officer certification under Government Code section 1029.¹⁶¹ For every thousand peace officers, there were about eight, six, and four officers subject to a certification action among

¹⁵⁸ A report or complaint of misconduct may include multiple types of misconduct.

¹⁵⁹ Number of allegations is as assessed by POST. Any one report, complaint, and/or case may include multiple allegations, and reports, complaints, and/or cases may involve one or more officers. Allegations were received by POST starting January 1, 2023, and this data is current to August 4, 2025. POST, Peace Officer Certification Reporting, <<https://post.ca.gov/Peace-Officer-Certification-Reporting>> [as of XX, 2025].

¹⁶⁰ Southern California is defined as San Luis Obispo, Kern, and San Bernardino counties, and all counties south of those three counties. Northern California is defined as all other counties, including Monterey, King, Tulare and Inyo counties. Population of the two regions is approximately 24 million and 16 million, respectively. As of August 2025, there were approximately ten thousand peace officers employed by a statewide agency, forty-six thousand peace officers employed by a local Southern California agency, and twenty-seven thousand employed by a Northern California agency. POST, *Agency Statistics* <<https://post.ca.gov/Agency-Statistics>> [as of XX, 2025]; POST, *Peace Officer Certification Actions* <<https://post.ca.gov/Peace-Officer-Certification-Actions>> [as of August 4, 2025]; POST, *Agency Statistics* <<https://post.ca.gov/Agency-Statistics>> [as of XX, 2025].

¹⁶¹ Government Code § 1029 provides, in part, that individuals who have been convicted of a felony, have been subject to other specified legal outcomes, or are listed in the National Decertification Index. See Gov. Code § 1029, subd. (a).

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local Northern California agencies, local Southern California agencies, and statewide agencies, respectively.¹⁶²

The most common categories of complaint, charge, or allegation resulting in a decertification action under SB 2 are egregious or repeated acts that violate the law, followed by physical abuse or excessive force, dishonesty, sexual assault, demonstrating bias, and abuse of power.¹⁶³ As of August 4, 2025, there have been no decertification actions relating to participation in a law enforcement gang or the failure to intercede when present and observing force that is clearly unnecessary.¹⁶⁴ As of August 4, 2025, there have been no new decertification actions under SB 2 where the basis of the action is a demonstration of bias.

Figure X. Proportion of Serious Misconduct Bases Within Certification Actions (Up to August 4, 2025)

Basis ¹⁶⁵	Certification Actions ¹⁶⁶	
	Number	Percent
Acts that Violate the Law	113	54.59%
Physical Abuse/Excessive Force	31	14.98%
Dishonesty	23	11.11%
Sexual Assault	21	10.14%
Abuse of Power	9	4.35%
Demonstrating Bias	6	3.86%
Failure to Cooperate	2	0.97%

Between Northern and Southern California, the basis of a complaint, charge, or allegations of serious misconduct did not vary significantly; there is a relatively higher proportion of the abuse of power and demonstrating bias basis in Southern California, and a relatively higher proportion of the dishonesty basis in Northern California.

¹⁶² POST, *Peace Officer Certification Actions* <<https://post.ca.gov/Peace-Officer-Certification-Actions>> [as of August 4, 2025].

¹⁶³ See POST, *Peace Officer Certification Actions* <<https://post.ca.gov/Peace-Officer-Certification-Actions>> [as of August 4, 2025].

¹⁶⁴ POST, *Peace Officer Certification Actions* <<https://post.ca.gov/Peace-Officer-Certification-Actions>> [as of August 4, 2025].

¹⁶⁵ The basis of allegations and certification actions may include multiple types of misconduct.

¹⁶⁶ A certification action is a suspension or revocation of a certificate, or an officer being made ineligible pursuant to Government Code section 1029. A certification action may be the result of one or more allegations, and certification action with different bases may occur in the course of one SB 2 process. For example, an officer may be temporarily suspended after being discharged for demonstrating bias, then subsequently the officer's certification could be revoked following a voluntarily surrender. In that instance, the basis of the final action, revocation, would not be demonstrating bias. Certification actions began on January 1, 2023. This data is current to August 4, 2025.

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Figure X. Regional Serious Misconduct Basis for Certification Actions (Up to August 4, 2025)

Basis	Certification Actions	
	Northern	Southern
Acts that Violate the Law	67.92%	67.19%
Physical Abuse/Excessive Force	10.38%	10.16%
Dishonesty	11.32%	8.59%
Sexual Assault	8.49%	8.59%
Abuse of Power	1.89%	5.47%
Demonstrating Bias	1.89%	4.69%

3. SB 2 Actions Within Agencies

In terms of the numbers of sworn officers, Southern California's largest law enforcement agencies are larger than Northern California's largest law enforcement agencies. Similarly, as of August 4, 2025, the five law enforcement agencies with the most officers subject to SB 2 certification actions, including those most recently previously employed by the agency, were in Southern California, with between 12 and 62 officers subject to such actions; in Northern California, the number of officers subject to SB 2 decertification actions is between 9 and 19. Generally, the most common type of serious misconduct involves acts that violate the law.¹⁶⁷

¹⁶⁷ POST, *Peace Officer Certification Actions* <<https://post.ca.gov/Peace-Officer-Certification-Actions>> [as of August 4, 2025].

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Figure X. SB 2 Actions by Agency (Up to August 4, 2025)

Last Employing Agency	Officers Subject to SB 2 Actions	Sworn Officers	Most Common Recent Certification Action ¹⁶⁸	Most Common Serious Misconduct
Los Angeles County SD	62	8689	23 Temporary Suspensions	21 Acts that Violate the Law
Los Angeles PD	39	8534	11 Ineligible Pursuant to GC 1029	12 Acts that Violate the Law
Riverside County SD	25	2864	11 Temporary Suspensions	12 Acts that Violate the Law
San Diego PD	13	1765	5 Revoked	2 Acts that Violate the Law
San Bernardino County SD	12	2025	6 Revoked	3 Acts That Violate the Law
San Francisco PD	19	1776	8 Temporary Suspensions	6 Acts that Violate the Law
Alameda County SD	19	997	12 Temporary Suspensions	11 Acts that Violate the Law
San Jose PD	12	997	6 Temporary Suspensions	5 Acts that Violate the Law
Contra Costa County SO	9	631	5 Temporary Suspensions	5 Acts that Violate the Law
Antioch PD	9	88	4 Revoked	5 Acts that Violate the Law
California Highway Patrol	33	7157	12 Temporary Suspensions	7 Physical Assault/Excessive Force

4. Temporary Suspensions

Last year, temporary suspensions made up around half of all most recent certification actions regarding a particular officer, but now temporary suspensions make up around one third of those actions, demonstrating the resolution of those temporary suspensions.¹⁶⁹ As of August 4, 2025, there are 139 temporary suspensions related to a pending criminal proceeding. They have been pending for an average of 458 days. Forty-nine temporary suspensions without collateral criminal proceeding have been pending for 393 days on average. Those proceedings are typically related to serious misconduct of a discharged or retired officer. As of August 4, 2025, 55

¹⁶⁸ Multiple certification actions may occur in the course of one SB 2 process. Because temporary suspensions frequently precede more permanent SB 2 dispositions, only the most recent certification action is reported.

¹⁶⁹ See Racial and Identity Profiling Advisory Board, Annual Report (2025 Report) (2025) p. 137

<<https://oag.ca.gov/system/files/media/ripa-board-report-2025.pdf>> [as of Aug. 27, 2025].

DRAFT REPORT – PENDING EDITING AND REVIEW

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temporary suspensions reached a permanent disposition. Of those 55, 27 temporary suspensions with related collateral criminal proceedings took an average of 407 days to resolve. The other 28 suspensions—without collateral criminal proceedings—took an average of 303 days to conclude.¹⁷⁰

III. VISION FOR FUTURE REPORTS

As with the Board’s prior review of SB 2 decertification actions in the 2025 report, this year’s report adds to the Board’s understanding of the SB 2 process and POST’s statutory obligations to address officer bias and, by extension, the ongoing concern of racial and identity profiling. Subsequent reports can build off of the data contained in these reports to give the Board a more complete assessment of emerging trends in the data, and will allow the Board to determine whether POST’s decertification process can be improved to more effectively combat racial and identity profiling through that process.

The Board is mindful of, and reiterates, its stated goals of examining efforts to create a nationwide database for reporting officers who have been decertified or made ineligible due to substantiated complaints of bias or racial and identity profiling. Such a database would ensure that officers who have committed serious misconduct cannot continue to commit such misconduct in other jurisdictions. Indeed, at the state level, this was the purpose of SB 2: by passing this important legislation, offending officers in one area of California could not simply move to another county, city, or precinct to engage in the same serious misconduct again and again. The purpose of SB 2 is one the Board supported for California, as it improves the public safety of all Californians, and a similar, nationwide approach is one the Board would support for the public safety and welfare of all citizens nationwide.

¹⁷⁰ POST, *Peace Officer Certification Actions* <<https://post.ca.gov/Peace-Officer-Certification-Actions>> [as of August 4, 2025].

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