

VILLAGE OF OAK PARK
CITIZENS POLICE OVERSIGHT RECOMMENDATION

Phase 5

REPORT & PRESENTATION





Table of Contents

Introduction.....	3
Phase 1: Needs Assessment – Baseline Conditions and Functional Review.....	4
Phase 2: Effective Practices Research – National Models and Guiding Principles	5
Summary of Benchmark Cities and Oversight Models.....	5
Results of the Benchmarking Study	7
Oversight Functions Comparison: Oak Park v. Cambridge Model	8
Phase 3: Consultation and Collaboration – Stakeholder Voice and Public Engagement	10
Oak Park Police Department Feedback	10
Citizens Police Oversight Committee Feedback	11
Village Officials Feedback.....	11
Key Themes and Takeaways	12
Phase 4: Recommendations – Action Plan and Implementation Roadmap	12
Findings and Recommendations Themes with Implementation Phases.....	13
1. Governance and Legal Structure	14
2. Membership and Appointments.....	15
3. Scope of Oversight.....	15
4. Access to Information	16
5. Staffing and Resources.....	17
6. Training and Capacity Building	17
7. Communication and Transparency	18
8. Police Engagement and Feedback Loops.....	19
9. Data Systems and Access Protocols	19
10. Performance Metrics and Evaluation.....	20
11. Ongoing Structural Review.....	20
Proposed Action Plan	21
RACI Table – CPOC Oversight Implementation Stakeholder Responsibility	22
Gantt Chart – Preliminary Implementation Timeline.....	23
Conclusion	24
Summary of Findings and Recommendations	26



Phase 5: Final Report

Appendices

Appendix A - Phase 1: Needs Assessment Report

Appendix B - Phase 2: Best Practices Research Report

Appendix C - Phase 3: Consultation and Collaboration Summaries

Appendix D - Phase 4: Findings and Recommendations Development



Introduction

The Village of Oak Park launched a multi-phase evaluation initiative to modernize and strengthen its civilian oversight of the Oak Park Police Department (OPPD). This initiative was guided by a 2024 Request for Proposals (RFP) that called for a thorough assessment of the existing oversight structure, exploration of national best practices, inclusive community engagement, and the development of a strategic implementation roadmap. At the heart of this initiative is the Citizens Police Oversight Committee (CPOC), a longstanding volunteer body that has played a key role in reviewing complaints and promoting accountability. However, evolving community needs, legal standards, and public expectations necessitated a deeper evaluation of its mission, structure, and operational capacity.

This report serves as a summary of Phases 1 through 4, each of which was detailed in standalone reports prepared and delivered to the Village of Oak Park by Pivot Consulting Group (Pivot). These individual reports captured findings and analysis which progressively shaped our final recommendations responsive to the RFP. For more detailed information, please refer to the full reports submitted during each phase of the project.

The evaluative process was carried out across five sequential phases. Phase 1 provided a baseline needs assessment of the CPOC, identifying both its foundational strengths and critical challenges. Phase 2 benchmarked national models of civilian oversight, highlighting organizational structures and practices relevant to Oak Park's goals. This ultimately led to Pivot recommending the Cambridge model for the Village to emulate, a review model with professional support. Phase 3 centered on public engagement, collecting input from Village leadership, police officials, CPOC members, and residents to ground potential oversight reforms in local experience. Phase 4 synthesized these findings into a set of 11 recommendations for structural and operational reform in a collaborative effort with the Village. Finally, Phase 5 is a report and presentation on the framework Pivot believes is best tailored to Oak Park's unique civic environment.

This project reflects Oak Park's commitment to putting into place an oversight model that ensures accountability of OPPD that is fair, impartial, and upholds the principles of constitutional policing while considering how oversight can positively impact the Village's policing system. By aligning local vision with national best practices, and by embedding reform in collaboration and clarity, the Village will be positioned to serve as a model for modern oversight; one that protects public safety while elevating public trust.



Phase 1: Needs Assessment – Baseline Conditions and Functional Review

Strengths	Weaknesses
<ol style="list-style-type: none">1. Functional complaint review process with defined procedures2. Increasing access to police materials, including redacted body-worn camera footage3. Longstanding recognition and legitimacy in Oak Park civic life4. Direct reporting line to Village Board through Trustee liaison	<ol style="list-style-type: none">1. Limited scope of duties and an unclear process for expanding authorities2. The CPOC Procedural Rules and Village Code need to be updated to reflect current practices and expanded authorities3. Capacity constraints: all-volunteer structure, infrequent meetings, delayed reports4. Lack of stakeholder agreement on the CPOC's mission, vision, and values
Opportunities	Threats
<ol style="list-style-type: none">1. Increase communication and collaboration with the Board of Trustees, police, and the community2. Clarify the CPOC's oversight jurisdiction3. Codify broader authority and build structured frameworks for evaluating police practices, not just complaints	<ol style="list-style-type: none">1. The CPOC's ability to provide independent oversight is constrained by restricted access to information and unclear processes for feedback or pursuing new areas of interest2. Lack of a formal communication mechanism and structure between the CPOC and OPPD makes for inconsistent follow up and unmet expectations3. Perceived political influence undermines the independence and legitimacy of the CPOC

Phase 1 established a foundational understanding of Oak Park's civilian oversight landscape by conducting a robust diagnostic assessment of the CPOC. The assessment process included 16 stakeholder interviews, document reviews, and observation of both CPOC and Village Board meetings. The committee was found to possess a functional complaint review system and moderate access to police records, making it operationally viable. The CPOC also benefits from general civic legitimacy, as most stakeholders acknowledged its historical and symbolic value to the community.



Phase 5: Final Report

However, the assessment exposed a number of areas which could be strengthened. The committee's governing documents have not been updated in decades, leading to confusion about its perceived mandates. Some provisions, such as those related to complaint intake and demographic analysis, have become outdated or are no longer being practiced. Additionally, the committee also lacked feedback loops with OPPD, resulting in recommendations being issued without confirmation of review or implementation.

As with most volunteer bodies, capacity limitations are pronounced. Complaint review is a time-consuming process in and of itself. Emerging initiatives, such as the review of the Flock technology, are significantly constrained by the amount of time a volunteer committee member commits to the effort, leading to gaps in the continuity of the CPOC's analysis. The all-volunteer CPOC has only part-time staff support, which impacted administrative processes. Furthermore, tensions emerged between the CPOC and OPPD over the CPOC's role, with some stakeholders perceiving the CPOC as exceeding its authority, especially when delving into police policy issues or surveillance oversight. This ambiguity in mission and scope has created friction between CPOC, OPPD, and the Village.

Phase 1 concluded that Oak Park's existing oversight model would benefit from an update informed by effective practices used in similar communities that align with Oak Park's values. Phase 2 provides that overview.

Phase 2: Effective Practices Research – National Models and Guiding Principles

Summary of Benchmark Cities and Oversight Models

City	Oversight Model Type	Key Features	Relevance to Oak Park
Berkeley, CA	Hybrid – Investigative / Auditor / Review	Combined board and auditor, investigatory powers	Comprehensive model for reform
Burlington, VT	Review	Community-based review, emerging structure	Developing oversight model
Cambridge, MA	Review	Community participation, limited authority	Similar in size and structure but capacity enhanced with professional staff



Phase 5: Final Report

City	Oversight Model Type	Key Features	Relevance to Oak Park
Cedar Rapids, IA	Review	Citizen-led oversight panel	Data driven oversight
Champaign, IL	Review	Citizen input on completed IA cases	Model of board that reviews cases before Chief's decision
East Lansing, MI	Review	Public dashboards, proactive community input	Transparency practices
Evanston, IL	Review	Equity-focused approach, resident training	Community-led accountability
Indianapolis, IN	Review	Mandatory training, staff support	Model of complaint intake and concurrent investigations
Madison, WI	Auditor/Monitor	Embedded auditor with policy review powers	Model for procedural fairness and transparent community engagement
Palo Alto, CA	Auditor/Monitor	Professional oversight, limited community role	Model demonstrates how contracted professionals can supplement oversight
Pasadena, CA	Auditor/Monitor	Auditor has the authority to monitor internal investigations	Strong city support and staffing
Santa Rosa, CA	Auditor/Monitor	Independent office with trend analysis	Systemic review approach

Phase 2 began with a comprehensive review of national models of civilian oversight, placing particular emphasis on jurisdictions that reflected Oak Park's size, structure, and policy goals. Pivot examined twelve jurisdictions, assessing their oversight systems in relation to seven of the National Association for Civilian Oversight of Law Enforcement's (NACOLE) Principles of Oversight: independence, adequate jurisdiction and authority, unfettered access to data, public reporting and transparency, community engagement, adequate funding and resources, and ongoing training.



Phase 5: Final Report

The primary models of oversight defined by NACOLE are review, auditor/monitor/ombuds systems, investigative, and hybrid models. Review models typically analyze completed internal affairs investigations and provide findings or recommendations to city or police leadership. Auditor/monitor/ombuds models embed professional staff in oversight roles, conducting real-time evaluations of investigations and data trends. Investigative models place emphasis on independent investigations of complaints. Hybrid systems offer elements of review, combined with some functionality of a different model.

Review models, such as those in Cambridge, MA and Champaign, IL emphasized public participation but faced limitations in scope and investigatory access. Auditor models in places like Madison, WI and Santa Rosa, CA enabled deeper policy analysis and systemic review, particularly with dedicated staff. Investigative and hybrid models such as Berkeley's Police Accountability Board in California proved the most versatile, supporting both community input and expert evaluation, but come with significantly higher implementation costs.

Successful models shared certain characteristics, regardless of oversight type. These included:

- Legally codified authority, often through municipal code or charter amendment
- Independent staff with defined access to case materials
- Structured training for board members and staff
- Use of public-facing websites and regular reporting
- Deliberate community outreach and stakeholder inclusion strategies

The research also examined staffing models and funding allocations. Jurisdictions with salaried staff, such as analysts, liaisons, and executive directors, were able to provide more thorough oversight but required allocated funding. Conversely, volunteer-only boards struggled to sustain momentum and often lacked operational continuity.

Results of the Benchmarking Study

The study concluded that Oak Park would benefit from a review model with professional support similar to the Cambridge model. A key strength of the Cambridge model lies in its dedicated professional staff who support the day-to-day work of civilian oversight. Staff can provide continuity, technical expertise, and administrative capacity that are essential for the CPOC's increasing mandates. Historically, Oak Park has relied on an all-volunteer committee with limited administrative support. Adopting a similar professional staffing



Phase 5: Final Report

approach would dramatically increase its ability to operationalize the recommendations made in Phase 4. Tasks like case tracking, data management, public reporting, training coordination, and stakeholder engagement require both time and specialization, something that would be challenging for volunteers alone to implement and sustain over time.

Professional staff can also serve as the backbone for implementing performance metrics, building communication protocols with the police department, managing complaint intake and review, and maintaining transparency tools on the CPOC's webpage. In the Cambridge model, staff play a neutral role in facilitating oversight while ensuring compliance with legal and procedural standards. For Oak Park, this means the community's vision for proactive oversight could be translated into concrete action, with staff managing the logistics and ensuring consistency across leadership transitions. This structure would help sustain the work of civilian oversight, turning the Village's strategic plan into an operational reality.

Oversight Functions Comparison: Oak Park v. Cambridge Model

Oversight Function	Current in Oak Park (CPOC)	Cambridge Model	Updated Oak Park Model
Staffing	Volunteer committee with part-time administrative support.	Full-time staff shared across multiple commissions with the City's Diversity, Equity, and Inclusion Division, plus a five-member volunteer board.	Full-time professional staff.
Complaint Review Process	Reviews complaint summaries and makes recommendations after internal investigations are complete and Chief has made final determination.	Staff meet monthly with IA to review cases; staff may only investigate if IA has a conflict. The Board reviews completed cases and makes recommendations.	Participates earlier in the process; staff conduct independent review and monitor investigations.
Access to Information	Limited to Internal Affairs summaries and select records; BWC access controlled by police.	Long-standing practice, staff have access to complaint files, IA reports, officer statements, computer aided dispatch logs, and police reports; BWC access is still being developed. Board reviews cases in executive session.	Full access to case files including but not limited to IA reports, officer statements, computer aided dispatch logs, police reports, body-worn camera footage, and investigative documentation.



Phase 5: Final Report

Oversight Function	Current in Oak Park (CPOC)	Cambridge Model	Updated Oak Park Model
Police Interaction	No formal obligation for police leadership to attend CPOC meetings; inconsistent feedback loop.	Staff meet regularly with IA. IA leadership always attend Board meetings, and the Police Commissioner attends 2-3 times per year; there is no formal requirement for written responses to recommendations.	Regular briefings with police; Chief attends a number of scheduled meetings in a calendar year; formalized communication process and mandated response to recommendations.
Policy Review	Occasionally discusses policy issues but lacks authority or resources for proactive review.	Staff make policy recommendation based on case reviews or community concerns.	Dedicated capacity to review, analyze, and propose reforms to department policies based on case reviews, trends, best practices, and new industry standards.
Community Engagement	Public meetings and some outreach, but limited capacity for broader education or dialogue.	Staff assists complainants in navigating the complaint process; Board meetings are public and quarterly reports are posted online.	Compliment and mediation programs, listening sessions, public-facing reports, and formal complaint navigation assistance.
Training for Members	No formal onboarding training requirements. Some training available during tenure.	Board and staff receive required state training and regular professional development, including NACOLE and police provided sessions.	Institutionalized onboarding and continuous training on law, equity, and police practice.
Data Use and Trend Analysis	Minimal; relies on requests and some reporting provided by OPPD.	Quarterly reports summarize complaints by type, outcome, and time from intake to closing; broader trend analysis is limited.	Mandated access and independent reviews to contribute to public safety improvements. Staff analyze trends in complaints, use of force, stops, etc.
Transparency and Reporting	Semi-annual report issued with general statistics and narrative summaries.	Quarterly reports are issued and publicly posted; no dashboards or formal performance metrics.	Publicly posted reports, recommendations, complaint action summaries, and educational materials.



Phase 3: Consultation and Collaboration – Stakeholder Voice and Public Engagement

Phase 3 of the Oak Park civilian oversight reform initiative emphasized stakeholder engagement and community collaboration. The goal of this phase was to collect diverse perspectives, build mutual understanding, and ground oversight evaluation in the lived experiences of residents, CPOC members, police personnel, and public officials. Through structured interviews, surveys, and a public forum, this phase generated diverse perspectives of how the CPOC functions, is perceived, and might evolve.

During this phase, Pivot conducted 17 structured interviews with Village leadership, OPPD personnel, and CPOC members. In addition, Pivot hosted a public engagement forum and distributed surveys to solicit input from internal stakeholders and Oak Park residents. These efforts were designed to identify both shared values and contested views around civilian oversight, with a particular emphasis on operational clarity, transparency, and the committee's influence on police policy and accountability.

Oak Park Police Department Feedback

Feedback from OPPD representatives revealed thoughtful engagement with the goals of civilian oversight. Many officers and command staff expressed support for the idea of independent review and accountability, particularly when it helps strengthen community trust and improve departmental transparency. Officers acknowledged that the CPOC serves an important role in bridging the gap between the public and police leadership. Several members of the department emphasized the importance of training and familiarization on police procedures and policies, applicable laws, and labor agreements for CPOC members.

Officers also offered constructive feedback on operational issues such as timing of case reviews, clarity around procedures, and communication methods. For example, some officers noted that misunderstandings occasionally arise due to technical limitations, such as how body-worn camera footage is redacted or presented for review. They recommended clearer guidance and more structured formats for sharing case materials with the CPOC. Officers also welcomed opportunities for increased collaboration, such as establishing regular dialogue or joint training opportunities to build shared understanding. A few department members observed that more predictable oversight processes could enhance cooperation and foster mutual respect between the committee and the department. Overall, OPPD personnel showed a willingness to engage with and improve the oversight



relationship, emphasizing their commitment to a professional, accountable, and transparent public safety culture.

Citizens Police Oversight Committee Feedback

CPOC members offered detailed reflections on their responsibilities and aspirations for the committee's role. Many expressed pride in their service and their commitment to community safety and justice. Members highlighted the unique perspective that a civilian board brings to questions of police accountability and policy evaluation. While they noted some challenges, such as limited access to full case documentation or real-time materials, they also emphasized a willingness to work collaboratively with OPPD and Village leadership to clarify processes. Several members shared ideas for improving workflow, including clearer orientation protocols, more training opportunities, and deeper involvement in emerging policy issues. Notably, there was enthusiasm for expanding the committee's reach beyond complaint review to areas like data analysis, community education, and broader policy oversight. Members agreed that increased communication and transparency could strengthen both internal functioning and public trust in the CPOC's work.

Village Officials Feedback

Several Village officials and trustees voiced a strong interest in enhancing the effectiveness of the CPOC. While acknowledging the need to maintain checks and balances, they expressed support for updating policies and procedures to strengthen the committee's independence and operational clarity. The Village President emphasized the importance of appointing committee members who reflect a range of community perspectives, and trustees noted that the Board is open to more structured follow-up and communication from the CPOC. Rather than signaling resistance, these insights suggested an appetite for recalibrating oversight practices to improve alignment, build mutual accountability, and deliver better outcomes for both the community and the OPPD.

Community feedback during public forums and through surveys was thoughtful and engaged. Residents who participated expressed appreciation for the existence of the CPOC and for the Village's willingness to undertake a multi-phase review of its oversight systems. Many community members offered constructive ideas, such as making committee decisions more accessible, increasing the visibility of CPOC meetings and reports, and ensuring the committee reflects the diversity of Oak Park. Some residents expressed interest in serving on the CPOC if more training and support were made available. Importantly, participants emphasized that oversight should not only review



Phase 5: Final Report

misconduct but also provide a platform for promoting fairness, transparency, and long-term trust in public safety systems. The overall tone from the public was solution-oriented and hopeful, with many endorsing efforts to modernize and clarify the committee's mandate and practices.

Key Themes and Takeaways

- There is consensus across stakeholders that civilian oversight is vital to public trust, but mechanisms for influence and accountability remain underdeveloped.
- Procedural ambiguity and inconsistent communication could be improved to strengthen collaboration between the CPOC, OPPD, and Village leadership.
- The CPOC's access to investigatory materials is limited, undermining its ability to act independently.
- Political discretion in appointments and lack of structured feedback loops impact stakeholder perception of the CPOC's purpose and authority.
- There is community interest in more direct involvement and better public-facing reporting from the CPOC.
- Stakeholders agree that oversight reform must clarify roles, build mutual respect, and ensure proper resourcing.

Phase 3 validated the diagnostic and research work of earlier phases while centering stakeholder voices in the process. It revealed a growing alignment around the need for clearer authority, increased capacity, and greater mutual accountability. These insights laid the foundation for the structured, collaborative, and phased recommendations found in Phase 4.

Phase 4: Recommendations – Action Plan and Implementation Roadmap

Phase 4 of the Oak Park civilian oversight reform initiative synthesized findings from the earlier phases to generate a set of concrete, actionable recommendations. These recommendations address core structural and operational issues facing the CPOC and are intended to position Oak Park as a leader in transparent, equitable, and community-driven oversight. Drawing from previous analyses and engagements, Phase 4 presented a three-tiered plan (short-term, intermediate, and long-term) that tackled legislative updates, staffing, training, data systems, and public communication. Many of Pivot's recommendations are short-term objectives that should be achieved at the beginning of



Phase 5: Final Report

the implementation period. These are the major changes to governing documents and communicating the reset of expectations amongst stakeholders moving forward. The intermediate term accounts for implemented changes that began in the short-term and are ongoing or continue to be in progress. The long-term objectives are civilian oversight in action, post-reform. It also builds in the review of the CPOC's performance and structure to keep CPOC's focus responsive to the changes in civilian oversight needs in Oak Park.

Short-term goals (0-6 months) include revising the ordinance and procedural rules to reflect an expansion of oversight scope to include policy review and systemic reviews. Operational improvements include establishing bylaws, formal communication, voting protocols, and structured written recommendations. Developing the job description and recruitment of the full-time staff person (liaison, analyst, or administrative support) should begin in this phase so the position is filled and the staff member can begin work as quickly as possible, ideally, not later than the beginning of 2026. To increase transparency and community engagement, the Village should develop the CPOC webpage, institute a compliment program and establish a mediation program. With anticipated changes to staff and CPOC members, the Village should also develop criteria for member selection and CPOC member training requirements.

Intermediate objectives (6-18 months) focus on implementing a staff-supported complaint review system, establishing ongoing training for CPOC members, updating data systems, and increasing community outreach. The long-term objectives (18+ months) emphasize the sustainment of the changes made to the CPOC through institutionalizing policy evaluation, expanding CPOC's purview to include systemic analysis of the entire complaint process, formalizing policy review and recommendations, and codifying oversight of surveillance technology. The long-term objectives also include periodic evaluation of the CPOC's performance and structure of the organization to ensure alignment with the Village's needs and goals.

Findings and Recommendations Themes with Implementation Phases

Thematic Area	Phase(s)	Corresponding Recommendations and Findings
1. Governance and Legal Structure	Short-term	Findings 1, 2, 3, 16, 20, 23 Recommendations 1, 2, 5, 6
2. Membership and Appointments	Short-term	Finding 22 Recommendation 8



Thematic Area	Phase(s)	Corresponding Recommendations and Findings
3. Scope of Oversight	Short-term / Intermediate / Long-term	Findings 9, 10, 11, 12, 15, 16, 18 Recommendations 3, 4
4. Access to Information	Short-term	Finding 14 Recommendation 9
5. Staffing and Resources	Short-term	Finding 5 Recommendation 8
6. Training and Capacity Building	Short-term / Intermediate	Finding 4 Recommendation 8
7. Communication and Transparency	Short-term / Intermediate	Findings 13, 21, 22, 25 Recommendation 7
8. Police Engagement and Feedback Loops	Short-term	Findings 17, 19, 20 Recommendation 6
9. Data Systems and Access Protocols	Short-term / Intermediate	Findings 6, 7, 8 Recommendation 9
10. Performance Metrics and Evaluation	Long-term	Finding 24 Recommendation 10
11. Ongoing Structural Review	Long-term	Finding 24 Recommendation 11

Throughout, Phase 4 remained grounded in the RFP’s directive to support a well-resourced, equity-centered, and impactful oversight body. It underscored that true reform rests not in authority alone, but in legitimacy, clarity, and sustained community trust.

1. Governance and Legal Structure

The Village should consider changing the name of the CPOC from the Citizens Police Oversight Committee to a broader, more inclusive body. While the original intent of the committee remains the same, to provide accountability and transparency into the policing system by the community, the term “Citizens” implies some exclusivity that could easily be avoided. As policing affects the broader community, the oversight structure should as well. Some options include but are certainly not limited to Civilian Police Oversight Committee or Community Police Oversight Committee.

The legal foundation for the CPOC is currently embedded in an outdated ordinance that does not clearly define the committee’s scope, authority, or operating procedures. This ambiguity has led to inconsistent interpretations and occasionally conflicting expectations among stakeholders. Inadequate protections for committee independence and the lack of



Phase 5: Final Report

formal removal procedures also expose the structure to potential political influence and instability.

To address structural gaps and elevate the CPOC's role, Phase 4 recommends a comprehensive update to the committee's enabling ordinance, modeled in part after the Cambridge, Massachusetts Police Review and Advisory Board. The Cambridge model offers a clear, professionalized structure that combines independence, authority, and dedicated staff support, making it well suited for Oak Park's pursuit of meaningful oversight. Within this updated legal framework, the ordinance should define the committee's jurisdiction over complaint review, policy monitoring, and systemic analysis, while also codifying the ability to examine "special items of concern," such as emerging complaint patterns or trends, such as repeated allegations of excessive force or disproportionate enforcement, high-profile incidents or community issues of widespread concern, or policy or practice issues, such as surveillance tools or tactical deployments that may impact civil liberties. To operationalize these reforms, the CPOC should also adopt formal bylaws that govern internal decision-making, meeting procedures, communication protocols, and interagency coordination. Together, these legal and procedural upgrades would equip the CPOC to act with clarity, legitimacy, and resilience while remaining agile in the face of evolving public safety challenges.

2. Membership and Appointments

The appointment process for CPOC members was considered by some stakeholders to be overly discretionary and lacking in transparency and clear criteria. Some stakeholders expressed concern that the process permitted political considerations to shape committee composition. Without defined expectations for member qualifications, orientation, or training, the system risks inconsistent participation and underrepresentation of relevant community perspectives.

In response, Phase 4 recommends that the Village should revise the appointment process by developing formal eligibility criteria that prioritize impartiality, lived experience, diversity, and subject-matter expertise essential for effective oversight. A standardized vetting process and onboarding framework should be implemented to ensure that all members are fully prepared to provide objective oversight and engage with confidential materials, uphold legal responsibilities, and contribute meaningfully from the outset.

3. Scope of Oversight

Currently, the CPOC's work is largely limited to post-investigation complaint reviews, with little involvement in broader policy review, data analysis, or systemic accountability. This



Phase 5: Final Report

narrow scope diminishes its potential impact on systemic reform and limits the CPOC's ability to address root causes of public concern.

To transform the CPOC into a more proactive and impactful oversight body, Phase 4 recommends expanding CPOC's authority to include end-to-end complaint oversight, policy review, surveillance oversight, and systemic evaluation such as traffic and pedestrian stop data, use of force incidents, arrest demographics, and complaint resolution timelines. The CPOC currently has a narrow focus on post-investigation complaint review and lacks the authority and tools to examine broader issues that shape community-police relations. The CPOC should be engaged with intake of complaints through resolution, with access to all investigative materials in order to promulgate data analysis and trend evaluation. This broader operational scope would empower the CPOC to identify patterns, monitor institutional risks, and provide forward-looking recommendations grounded in evidence and public trust to OPPD and the Village.

This expanded scope should also include the authority to review and provide recommendations to evaluate the effectiveness, equity, and impact of OPPD policies, training programs, police surveillance technologies, and community concerns. Through this lens, the CPOC would not only help identify unintended harms or procedural gaps but also contribute constructively to policy innovation. In addition, the Village should amend the Law Enforcement Surveillance Oversight ordinance to grant CPOC a formal advisory role in reviewing proposed surveillance technologies. Together, these reforms would enable the CPOC to operate as a comprehensive oversight body, one that evaluates conduct, shapes policy, protects privacy, and contributes meaningfully to the Village's long-term public safety and equity goals.

4. Access to Information

CPOC members currently face barriers in reviewing comprehensive case files. Often, they receive condensed summaries rather than full reports, and access to BWC footage is typically limited to scheduled viewings facilitated and monitored by police personnel. This places the CPOC in a dependent position, where its findings are shaped by what they are presented. Further, inadequate data infrastructure and inconsistent data reporting further weakens the CPOC's capacity to monitor systemic issues, track trends, and fulfill its perceived oversight responsibilities.

Phase 4 recommends the Village modernize OPPD's data infrastructure and develop and implement secure, permission-based systems that allow CPOC members and staff to independently access full investigative files, including BWC footage, officer reports, and



other pertinent evidence. Further, to support the CPOC's broader mission, the CPOC should have access to the data and records necessary to identify trends, including redacted case files for external complaints, use of force data, and data related to surveillance technology. The Village should also establish formal data-sharing agreements that specify roles, timelines, confidentiality safeguards, and IT supported solutions for secure data transmission. Ensuring independent and complete access to data will strengthen the CPOC's analytical capacity and credibility.

5. Staffing and Resources

The dedication of volunteer CPOC members has sustained police oversight in Oak Park through years of civic engagement, but there is broad consensus that the committee is poised for a new chapter of growth and professionalism. While current resources have enabled foundational oversight work, the opportunity now exists to enhance CPOC's capabilities through focused staffing investment.

Phase 4 recommends supporting the committee with a professional staff position such as a liaison, analyst, or other administrative support role. Ideally, the CPOC staff position will operate under a dual reporting structure: administrative reporting to the Village Manager's Office and direct accountability to the CPOC for day-to-day priorities and deliverables.

This role will allow the CPOC to better serve the community through having a public facing place for complaint intake, complaint review, timely analysis, policy monitoring, and meaningful public engagement. A full-time staff position would provide stability across leadership transitions, manage administrative responsibilities, and serve as a liaison between the committee, OPPD, the Village, and community stakeholders. Investing in a full-time staff position would also allow for the CPOC's work to continue its transition from a reactive model of oversight, that reviews completed complaint investigations, to a more independent and proactive one, allowing the CPOC to be capable of transforming community concerns into actionable oversight, shaping a more accountable public safety system.

6. Training and Capacity Building

CPOC members bring a diverse range of professional, civic, and lived experience to their work in civilian oversight, an asset that has grounded the committee in an authentic community perspective. However, stakeholders across the board have expressed consistent support for formalizing, establishing, and elevating the CPOC's training program. There is broad agreement that structured learning is essential to strengthen the



Phase 5: Final Report

committee's credibility, ensure recommendations rooted in effective practices, and build confidence among parties that the CPOC's input is well-informed and objective.

Phase 4 recommends developing a robust, recurring training program covering legal standards, complaint procedures, cultural competency, bias awareness, police operations, union contracts, civil rights, and principles of due process and equity. However, training alone is not enough. Stakeholders are more likely to accept and act on the CPOC's recommendations when they are rooted in demonstrable expertise. Regular interaction with OPPD personnel as part of the training process will also help normalize collaboration, reduce misunderstandings, and ensure the CPOC is grounded in operational realities while maintaining independence. This model of joint learning, where community members understand policing systems and police understand oversight objectives, builds trust and strengthens accountability.

7. Communication and Transparency

The CPOC's work is deeply valued by many in the community, and there is strong support for making its contributions more visible and accessible to improve public understanding and to highlight the CPOC's role in advancing police accountability. Currently, meeting minutes and updates are published in limited formats which may not reach a wide audience. Increasing transparency and communication of the CPOC's work will not only showcase the CPOC's impact but also invite public understanding and involvement.

Phase 4 recommends that the CPOC develop a set of accessible, public-facing communication tools such as digestible complaint summaries, plain-language educational materials, as well as increasing CPOC updates to the Village Board. These tools will help ensure that the CPOC's work is shared widely, fostering public trust, shared ownership, and a more inclusive culture of oversight in Oak Park.

To reinforce positive relationships and expand the scope of resolution-oriented oversight, the Village should implement both a public compliment program and a mediation process under the CPOC's leadership. The compliment program would offer residents a way to recognize and celebrate positive officer conduct, helping to promote transparency and morale. The mediation program would provide a voluntary, confidential alternative to formal investigations for lower-level complaints involving miscommunication or minor concerns. Facilitated by trained mediators with expertise in police-community relations, these sessions would support restorative dialogue, procedural justice, and trust-building.



8. Police Engagement and Feedback Loops

The relationship between the CPOC and OPPD would benefit from clearer structure and stronger communication pathways to support shared goals. When the CPOC requests information that police leadership determines is beyond its scope, there is currently no formal process to address the disagreement. As a result, some requests remain unresolved, which can limit transparency and oversight. At the same time, both CPOC members and police officials recognize the value of building a more collaborative and trust-based partnership. There is mutual interest in establishing regular meetings, open dialogue, and shared learning opportunities to promote understanding and reinforce their complementary roles in public safety. With clearer expectations and defined processes for engagement, the Village can support a productive and respectful working relationship.

To advance this effort, Phase 4 recommends the Village adopt formal bylaws that guide the CPOC's operations, communication standards, and stakeholder interactions. These should include structured voting procedures, written recommendations with timely responses, and a clear process for resolving disagreements. Public messaging should reflect majority decisions while allowing space for documented dissent. Meeting expectations and roles should be aligned with professional standards and informed by shared principles. Regular and consistent communication with police leadership and Village staff will further enhance coordination and transparency. By clarifying roles and creating intentional communication channels, the Village can empower the CPOC to serve as an effective and collaborative contributor to public safety oversight.

9. Data Systems and Access Protocols

The CPOC's ability to provide meaningful oversight is currently limited by outdated police data systems, inconsistent access to case materials, and a lack of dedicated analytical support. While OPPD and Village staff have shown a commitment to transparency and collaboration, the manual nature of current systems makes it difficult to generate timely, disaggregated, and actionable data. Pivot recognizes that the Village and OPPD have already begun efforts to update its data systems, which is a promising step towards addressing these challenges. Nonetheless, gaps in access and infrastructure have, at times, led to delays and misunderstandings.

To support this progress, Phase 4 recommends that the Village continue modernizing OPPD's data systems and establish formal, clearly defined protocols for information sharing. These reforms would enable the CPOC to receive timely access to relevant



materials, including case files, body-worn camera footage, and policy documents, while maintaining confidentiality protections. New systems should produce customizable reports and trend dashboards that help identify patterns and support thoughtful recommendations. With the help of IT support and confidentiality safeguards, CPOC members can be better equipped to carry out independent reviews and contribute to public safety improvements. Together, these steps will strengthen accountability, improve public confidence, and create a more responsive and collaborative oversight process.

10. Performance Metrics and Evaluation

The CPOC currently lacks clear performance metrics to evaluate the effectiveness of its oversight or its impact on police accountability. Without a structured way to measure progress, it is difficult to determine whether the committee's reviews, recommendations, and broader engagement are timely, meaningful, or leading to policy improvements. This absence of evaluative tools limits transparency and makes it harder to assess how well the CPOC is fulfilling its mandate or contributing to community trust in public safety. The committee's influence cannot be fully understood or strengthened without a consistent method for tracking outcomes, demonstrating value, and identifying opportunities for growth.

Phase 4 recommends that the Village establish a formal performance evaluation framework to support continuous improvement of the CPOC's oversight functions. This framework should assess the committee's work across key areas such as timeliness and completeness, impact on police accountability and policy reform, transparency and fairness in process, independence in decision-making, and responsiveness to community feedback. Both quantitative metrics and qualitative input should be used, and a peer review process may provide added insight and external perspective. By embedding a culture of evaluation, the CPOC can strengthen its credibility, demonstrate its effectiveness, and better serve the Oak Park community.

11. Ongoing Structural Review

To ensure the CPOC remains effective and responsive, stakeholders emphasized the importance of periodically reexamining its structure and performance. As the oversight landscape evolves and community needs shift, there is value in taking a step back to assess how well the committee's current authorities, procedures, and composition continue to serve its mission. A regular review process would allow the Village to identify structural gaps, procedural inefficiencies, and areas where the CPOC's role could be



Phase 5: Final Report

expanded or clarified. This practice aligns with industry standards and promotes a proactive approach to governance; one that reinforces fairness, equity, and public trust while keeping the committee well-positioned to meet future challenges.

Phase 4 recommends that the Village institutionalize a process for periodic evaluation of the CPOC's structure, performance, and alignment with community priorities. These reviews should take place at regular intervals, such as every 10 years, and should draw on both internal assessments and public input to evaluate the committee's relevance and impact. Findings should inform updates to the CPOC's enabling ordinance, procedural rules, training requirements, and public engagement strategies. By embedding this cycle of reflection and renewal, the Village can ensure that the CPOC remains an adaptive, accountable, and effective oversight body over the long term.

Proposed Action Plan

To support meaningful reform and align Oak Park's civilian oversight with best practices, this action plan is structured in short-term, intermediate, and long-term phases. The phased approach enables strategic planning, efficient use of resources, and measurable progress toward a more accountable and community-driven system. Success depends on immediate interim guidance from Village leadership to the CPOC and police department, ensuring early momentum while formal governance updates are underway. The proposed RACI table and Gantt chart below summarize the steps to implementation by phase and the preliminary timeline for implementation of recommendations.



RACI Table – CPOC Oversight Implementation Stakeholder Responsibility

Recommendation	CPOC	OPPD	VB	VA
Short-Term Actions (0–6 months)				
1. Interim Guidance and Governance Transition	C	I	A	R
2. Revise the Ordinance and Procedural Rules	C	C	A	R
3. Formalize Internal Procedures and Issue Referral Process	C	C	A	R
4. Develop Job Description and Hire CPOC Staff*	C/R	I	A	R
5. Initiate Public-Facing Transparency Measures*	A	C	I	R
6. Develop Structured Training and Onboarding*	R	C	A	C
7. Reform the Appointment Process*	C	C	A	R
8. Pilot Compliment Program*	A	I	C	R
Intermediate-Term Actions (6–18 months)				
1. Continue to Modernize Data Systems and Access Protocols	C	R	C	A/R
2. Reclaim the Complaint Intake Function*	C	R	A	I
3. Implement Structured Training and Onboarding	A	C	C	R
4. Launch a Comprehensive Engagement Plan*	A/R	C	I	C
Long-Term Actions (18+ months)				
1. Performance Evaluation of CPOC Effectiveness*	C	I	R	A
2. Institute Periodic Structural Review*	C	C	A	R
3. Expand CPOC’s Systemic Policy Oversight*	C	C	A	R

Legend

- R – Responsible: Executes the task
- A – Accountable: Owns the outcome
- C – Consulted: Provides input
- I – Informed: Receives updates
- Any combination of R, A, C, or I

Stakeholders

CPOC – Citizens Police Oversight Committee

OPPD – Oak Park Police Department

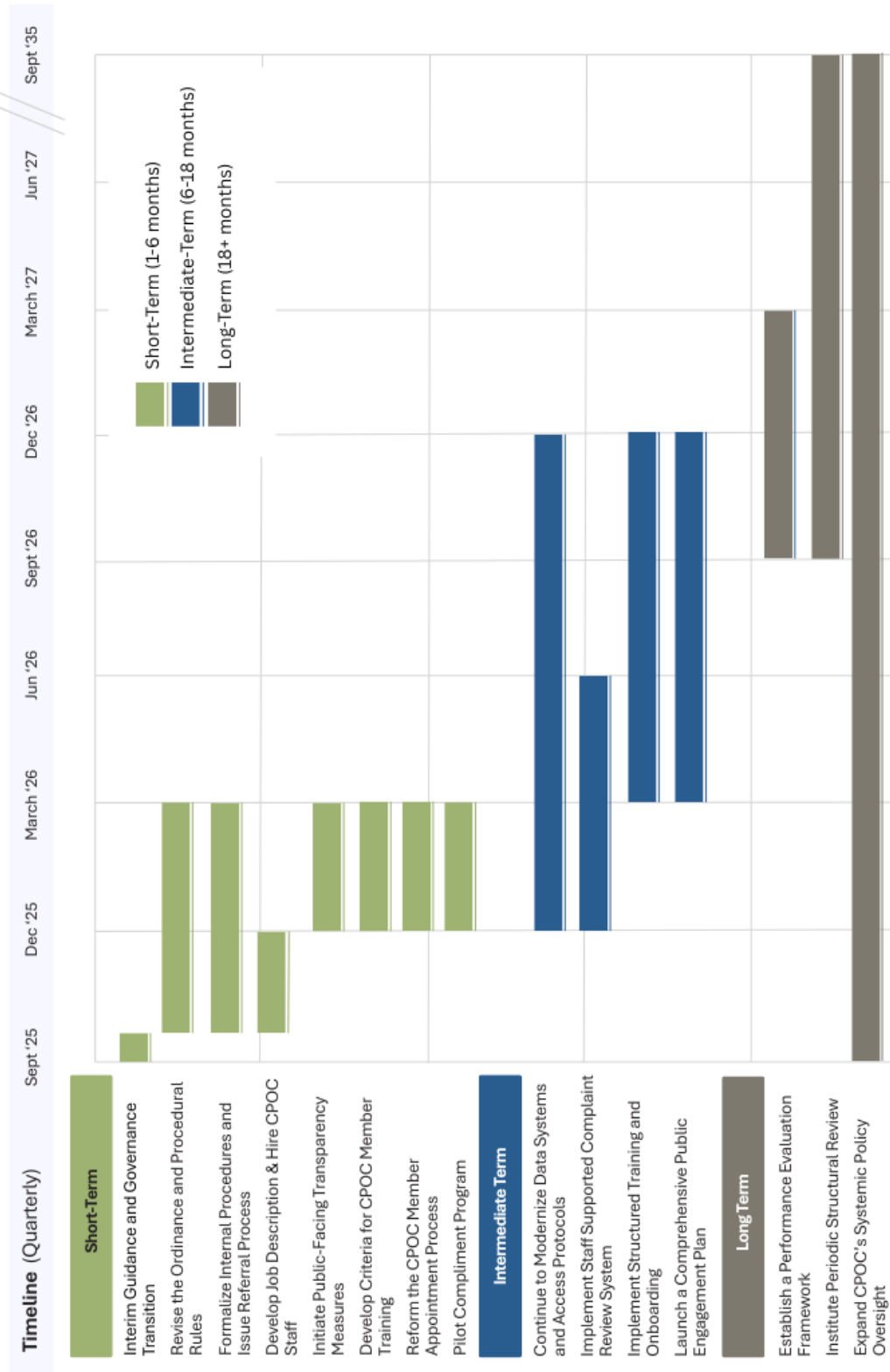
VB – Village Board

VA – Village Administration

*The public should be informed

Gantt Chart – Preliminary Implementation Timeline

Preliminary Implementation Roadmap for CPOC Oversight Reform





Conclusion

Establishing civilian oversight of law enforcement is an evolving process that must adapt to meet the changing needs of the community and the standards of modern governance. Throughout this evaluation, Pivot’s observations of the CPOC affirmed what BerryDunn and many stakeholders had already identified: the Village’s oversight structure, while rooted in good intentions and community values, is in need of strategic updates to maximize its impact. Recurring themes emerged across interviews, meetings, and document reviews. These themes included the need for greater clarity in roles and responsibilities, more consistent access to data and case materials, improved communication protocols, and a clearer performance framework. These findings reflect a collective recognition that Oak Park’s commitment to civilian oversight should be matched by the tools, structure, and support necessary for the CPOC to maximize its impact.

Importantly, this assessment also reinforced that Oak Park’s existing model is fundamentally functional. The CPOC is active, engaged, and committed, but it needs refinement to elevate its effectiveness and ensure long-term sustainability. Rather than replace the current system, Pivot recommends building upon its foundation by adopting elements of high-functioning civilian oversight models. This includes establishing professional staff support, formalizing procedures, enhancing policy review authority, and expanding involvement in areas such as surveillance oversight. These improvements will enable the CPOC to shift from reactive to proactive oversight, broaden its reach into systemic reform, and become a more consistent and constructive voice within the Village’s public safety landscape.

The adoption of a professionalized review model supported by dedicated staff will enhance the CPOC’s internal capacity, strengthen communication with key stakeholders, and ensure consistent and high-quality operations. The Cambridge model fits Oak Park’s unique oversight context. It reflects a strong desire for deeper community engagement, an established oversight structure, and leadership that values accountability. With a broadened scope that includes surveillance oversight and policy review, the CPOC can serve as a trusted mechanism for both community involvement and institutional accountability. When combined with a clear implementation roadmap, these reforms will move the Village from vision to action. By investing in and strengthening its oversight framework, Oak Park has the opportunity to lead by example and demonstrate how community-centered oversight can be a cornerstone of modern public safety governance.



Phase 5: Final Report

Implementing these reforms will take time, care, and coordination. Recognizing this, Pivot recommends the development of immediate interim guidance to bridge the gap between the current model and the one envisioned in this report. Interim protocols such as clarifying communication pathways, defining temporary authority for staff or committee leadership, and establishing expectations around timelines and data access will ensure that oversight continues effectively during the transition. These temporary measures are essential not only to maintain momentum but also to demonstrate the Village's commitment to oversight that is transparent, responsive, and forward-looking.



Summary of Findings and Recommendations

Findings

1. **Finding 1.** Stakeholders support strengthening the current committee structure rather than expanding into a full investigatory or disciplinary authority.
2. **Finding 2.** Outdated Village Code and Procedural Rules have enabled the perception of “mission creep” and undermined clarity.
3. **Finding 3.** The CPOC operates with undefined processes and the absence of formalities leading to inconsistent operations and diluted influence.
4. **Finding 4.** The CPOC lacks formal member training.
5. **Finding 5.** Dedicated staff is needed to carry out the CPOC’s functions and duties and ensure timely, impactful work.
6. **Finding 6.** Limitations in current data systems present challenges to OPPD’s responding to the CPOC’s evolving information needs.
7. **Finding 7.** Gaps in data access and clarity contribute to mistrust between the CPOC and OPPD.
8. **Finding 8.** Building analytical capacity is essential to support evidence-informed oversight.
9. **Finding 9.** The CPOC lacks formal compliment and mediation programs, limiting its ability to promote positive engagement and restorative solutions.
10. **Finding 10.** The CPOC’s current structure limits its ability to provide meaningful oversight and drive improvements in public safety policies.
11. **Finding 11.** The CPOC’s complaint review is primarily case-by-case, limiting its systemic impact.
12. **Finding 12.** Complaint investigations are prolonged and delay resolution for years.
13. **Finding 13.** The complaint process lacks transparency and public accessibility.
14. **Finding 14.** Gaps remain in OPPD transparency around Internal Affairs complaints provided to the CPOC.
15. **Finding 15.** The CPOC does not review internal complaints despite clear mandates to do so.
16. **Finding 16.** Several Procedural Rules are not consistently followed by the Village, OPPD, and the CPOC.
17. **Finding 17.** When the CPOC requests information or data that the police determine is outside of their scope, there is no dispute resolution process and the CPOC request goes unanswered indefinitely.



18. **Finding 18.** The CPOC's role in complaint intake needs clarification and earlier involvement.
19. **Finding 19.** Trust and communication between CPOC and police leadership remains fragile.
20. **Finding 20.** The relationship between the CPOC and police leadership lacks clear structure and shared expectations.
21. **Finding 21.** Community trust in civilian oversight is limited by perceptions of weak authority and visibility.
22. **Finding 22.** The CPOC appointment process lacks clear criteria compared to other oversight agencies, raising concerns about objectivity and public confidence.
23. **Finding 23.** The CPOC's scope and mission remain unclear and require formal clarification.
24. **Finding 24.** Investment in professional and structural reform is essential to strengthen oversight.
25. **Finding 25.** Strengthening community engagement is critical to building trust and visibility.

Recommendations

1. **Recommendation 1.** Pivot recommends that the Village of Oak Park consider adopting a review model like the Cambridge, Massachusetts Police Review and Advisory Board for restructuring the CPOC.
2. **Recommendation 2.** Pivot recommends that the Village undertake a comprehensive update of both the CPOC's enabling ordinance and Procedural Rules to clarify its mission, expand its oversight authority, and ensure consistency between policy and practice.
3. **Recommendation 3.** Pivot recommends that the Village expand the CPOC's authority and operational framework to support robust, end-to-end complaint oversight and enable proactive, evidence-based evaluation of systemic policing practices.
4. **Recommendation 4.** Pivot recommends expanding the scope of the CPOC to include formal authority to review and provide guidance on the use of future proposed use of surveillance technology by OPPD through amending the Law Enforcement Surveillance Oversight ordinance.
5. **Recommendation 5.** Pivot recommends formally defining "special items of concern" within the CPOC's governing authorities.



6. **Recommendation 6.** Pivot recommends that the Village implement formal bylaws on the internal operations, communication protocols, and interagency relationships of the CPOC.
7. **Recommendation 7.** Pivot recommends that the Village enhance the visibility, accessibility, and community value of the CPOC by implementing a coordinated strategy centered on public engagement, education, communication, and recognition.
8. **Recommendation 8.** Pivot recommends that the Village strengthen the CPOC's capacity, credibility, and long-term effectiveness by investing in professional staffing, implementing structured and recurring training for members, and reforming the appointment and onboarding process.
9. **Recommendation 9.** Pivot recommends that the Village modernize OPPD's data infrastructure and establish structured, consistent protocols for information access to enable timely, informed, and independent oversight by the CPOC.
10. **Recommendation 10.** Pivot recommends that the Village implement a formal framework to assess the effectiveness and budget allocation of the CPOC's oversight functions on an ongoing basis.
11. **Recommendation 11.** Pivot recommends that the Village institutionalize a process for periodic assessment of the CPOC's structure, performance, and alignment with evolving community needs.

Appendix A - Phase 1: Needs Assessment Report

VILLAGE OF OAK PARK
CITIZENS POLICE OVERSIGHT RECOMMENDATION

Phase 1

NEEDS ASSESSMENT REPORT





Introduction

In 2021, the Board of Trustees approved a comprehensive study of the Oak Park Police Department (OPPD) which resulted in several recommendations for improvement to the Citizen Police Oversight Committee (CPOC). While several of the recommendations have been implemented informally, there is significant work remaining to fully implement these recommendations. As such, the Village of Oak Park requested an in-depth evaluation of the CPOC's oversight function as part of their work in reimagining public safety.

The CPOC was created in 1991 as a progressive initiative rather than in reaction to a policing incident, which was advanced for its time. Since then, the CPOC's authorities have both expanded and contracted in scope over time. The model employed in Oak Park falls under the National Association for Civilian Oversight of Law Enforcement (NACOLE) oversight model of review boards. Most stakeholders we interviewed agree that the CPOC ordinance and charter need to be updated to meet the oversight needs of the Village in 2025. Currently, the CPOC only reviews external complaints and committee members have been asking for greater input regarding aspects of policing that affect community concern.

This report outlines the major themes provided by the various stakeholders to the Pivot Consulting Group (Pivot) team in preliminary meetings. The meetings gathered the stakeholders' knowledge, thoughts, and concerns regarding civilian oversight in the Village of Oak Park (the Village) and the function of the Citizen Police Oversight Committee (CPOC). Pivot evaluated the strengths, weaknesses, opportunities, and threats to effective oversight. The image below is a summary of the major categories Pivot identified in our assessment.

Phase 1: Needs Assessment Report

Figure 1: Needs Assessment summary



Methodology

Our team reviewed the CPOC governing documents including Article 30 of the Village Code and the CPOC Procedural Rules. Pivot was provided numerous other documents, including studies – including the 2021 report from Berry Dunn, articles, minutes of previous meetings, and other relevant documents for our review. In January 2025, the team traveled to Oak Park and conducted a site visit that included in-person meetings with stakeholders and attending a CPOC monthly meeting in both open and executive session where the Committee conducted a complaint review. The team has also observed a Village Trustee meeting where agenda items addressed issues concerning OPPD and the CPOC.

The team met with 16 stakeholders both virtually and/or in person during the January 2025 site visit. The stakeholders that the team met with included:



Phase 1: Needs Assessment Report

- 5 of the 7 Village Board of Trustees
- 6 of the 7 CPOC members
- Police Chief
- A Police Commander
- Sergeant Union leadership
- Patrol Union leadership
- Assistant Village Manager/HR Director/Staff Liaison to the CPOC
- Village Clerk
- CPOC Legal Counsel

The stakeholders we spoke with had similar goals for policing and public safety and all wanted the best police department possible for the Village. They also generally agreed that it is time for an update to the function and purpose of the CPOC and largely agreed that civilian oversight of police is essential for the Police Department to maintain public trust and for Oak Park to be a leader in progressive public safety practices.

However, emerging expectations have combined with a lack of established legislative authority for the CPOC has led to diverging ideas for the effective approaches to police oversight and have surfaced tensions between stakeholders in the process. Several stakeholders perceive that the CPOC is exceeding the scope of their function by recent efforts to be more involved in police and technology development, while other stakeholders perceive that CPOC is being hindered in carrying out its purpose by limiting its access to information or rejecting its recommendations. This tension has eroded trust between the Board of Trustees and the CPOC as well as the CPOC and the Police Department which has hindered the ability of the entities to collaborate toward their shared mutual goals.

Strengths

1. Functioning complaint review process

The CPOC mainly functions as a complaint review entity. In Pivot's review of the governing documents, we found that the CPOC does fulfill this requirement as a committee and we were able to observe this process firsthand. The CPOC's process of reviewing complaints has been well established since the creation of the Procedural Rules that govern this process, although the latest date of revision is unclear.

The CPOC had broader authority to review both internal and external complaints, although over time, the CPOC lost the ability to review internal complaints. Despite this, some stakeholders felt that the CPOC serves an impactful function because without them, there would be no police oversight. In Pivot's observation of the CPOC January 2025 meeting,



Phase 1: Needs Assessment Report

there was a clearly defined and working process where the Police Department provided the Committee with reports and case materials beforehand allowing the Committee members to review some materials prior to the meeting. The case was then discussed, and body worn camera (BWC) footage was reviewed in executive session with an in-depth discussion of the case prior to a final rollcall vote on the matter.

2. Increased access and influence

Overall, stakeholders have said that the CPOC's access has grown in recent years due to Committee members' continued efforts in asking for more authority. Despite various Committee members experiencing frustration regarding limited access to police materials, the CPOC's access has grown in recent years. Of note, the CPOC has gained some access to BWC footage to review during executive session in CPOC meetings. However, the footage is redacted due to the Village's custom and practice. A police representative maintains possession of the footage and it is not provided to the CPOC for independent review.

CPOC members can ask for segments to be played as much as necessary to arrive at a conclusion. In reviewing documents provided to Pivot, gaining BWC access was a top priority in CPOC workplans from three to four years ago. Village and police stakeholders also expressed appreciation for the perspective the CPOC brings stating it is part of a system that enhances police credibility. While there is no formal feedback process, when the CPOC poses questions to the Chief or requests another look at an investigation or a disciplinary finding, the Chief, or her representative, takes their feedback back and discusses it with police executive staff. There is no mechanism in place, however, for that feedback loop to be closed with the CPOC.

3. Recognized established entity within Oak Park

The stakeholders Pivot spoke with all recognized the long history of the CPOC. Its existence was not questioned or challenged, unlike some other newer oversight entities still trying to establish themselves. While there may be resistance to emerging authorities, the governing documents do provide the CPOC with some latitude. The governing documents also provide a path for the CPOC to request additional authority, functions, or duties and they have a direct line to the Village Board of Trustees with an assigned Trustee Liaison. Additionally, the stakeholders generally agreed that while the Police Department is well regarded in the community, civilian oversight provides an added layer of review for those who feel marginalized by the police. The CPOC's involvement in evaluating the complaint process can shine light to the complaint process if used effectively.

Weaknesses

1. Scope of duties

The CPOC is comprised of volunteers heavily invested in public safety. The committee members bring extensive and diverse expertise from their professional areas of practice. However, many of the members feel hamstrung by the limited scope the code allows. The code provides three duties:

- a. To receive and refer complaints;
- b. Monitor and evaluate the Police Department's efforts in racial and cultural diversity in areas such as training, recruitment, promotions, and interpersonal relationships; and
- c. Meet with and provide the Board of Trustees with reports on a semiannual basis of the Committee's actions for the last six months. In addition, the Committee may report to the Board on special items of concern within its purview.¹

Expand authority

There is one clause in the CPOC's duties that may expand its authority as written. The "special items of concern" clause allows for the Committee to report to the Board. However, its "purview" and "special items of concern" are not clearly defined. Recently, as CPOC members have requested more access and authority to provide more oversight, they have been met with pushback from various stakeholders who suggested that the CPOC was requesting authority outside their scope provided by the code.

As expressed in the BerryDunn study, Recommendation 5-4, it is clear that the Village, and not the OPPD as suggested by the study, should make changes to the Village Code/charter to improve its value to the community involving a new vision. Clear authorities and mandates are imperative to the effectiveness of any entity and putting these things into place will significantly enhance the impact of the oversight system many stakeholders believe will positively impact policing in the Village.

Evaluate effectiveness of policing

The CPOC's duties does not account for other areas in policing that factor into the OPPD's effectiveness in improving public safety and community trust. There is currently no structured mechanism for the CPOC to regularly evaluate whether policing strategies, policies, training, or new technologies. Without a clear measurement framework, policy

¹ Oak Park, Ill. GENERAL ORDINANCES OF THE VILLAGE, ch.2, art.30 §2(A)-(C)(2016).



decisions are often made based on perception rather than data. A framework should be developed to assess the efficacy of OPPD.

2. CPOC Procedural Rules and Village Code

The CPOC Procedural Rules and Village Code provides the CPOC several functions in the complaint intake process that are either not currently occurring or are unclear whether they are occurring:

- a. CPOC along with other departments in the Village shall be responsible for receiving any citizen complaints, including anonymous complaints, and conducting complaint intakes. CPOC Procedural Rules (II)(A)(1)(a),(c)-(d) & Oak Park, Ill. GENERAL ORDINANCES OF THE VILLAGE, ch.2, art.30 §2(A)(2016).
- b. During the intake process, the CPOC can ask a complainant for further basic information, determine outside investigation of a complaint is warranted, or when the communication is more of an inquiry in nature. CPOC Procedural Rules (II)(A)(1)(e).
- c. The complaint received will be referred to CPOC for further determination if within two days of receipt of the complaint, CPOC was not the original recipient of the complaint and further information is required. The CPOC shall have two additional working days to complete the basic information. The CPOC can determine whether to forward the complaint to the Police Department or to the President and Board of Trustees with its recommendation for outside investigation. CPOC Procedural Rules (II)(A)(1)(f).
- d. In cases of an inquiry, the CPOC will refer the complaint to the Community Relations Division. CPOC Procedural Rules (II)(A)(1)(h).
- e. Individual names and addresses will be deleted but identified by race, sex, status, and sexual orientation if relevant to the complaint, i.e. “a white male citizen,” or “a white female officer.” When the complainant is a juvenile, that will also be noted. CPOC Procedural Rules (II)(A)(2)(e)(11).
- f. Both the Police Department and the Human Resources Department shall provide a written quarterly report to the Village Manager and the Village Manager shall provide an annual report to the CPOC of all Department member complaints resolved within each respective department during the immediately preceding year. CPOC Procedural Rules (II)(C)(1).
- g. The Director of Human Resources/Secretary to the Fire and Police Commission of the Village shall report to the Committee information including race, sex, and age of applicants at the stages of the processes

outlined in CPOC Procedural Rules (IV)(A)(1)(c)-(i) on a semi-annual and anonymous basis.

- h. The Police Chief will annually report to the Committee a list of officers by race, sex, age, rank, and years of service: eligible for promotion to the next highest rank; who applied to take qualifying exams for promotion; who passed qualifying exams for promotion including the rank of each officer on the list; and officers who passed the examination who were promoted to the next higher rank. CPOC Procedural Rules (IV)(A)(3)(a)-(d).
- i. Investigations of complaints of systemic problems including patterns of racial or gender discrimination or other discriminatory practices not specifying individuals may be referred by the Board of Trustees to the Committee. CPOC Procedural Rules (V).
- j. The Committee's semi-annual report to the Board of Trustees should include complaint intake, referral, and processing of both citizen and Departmental member complaints. CPOC Procedural Rules (VI)(A).
- k. The informal investigation process shall not exceed sixty (60) days from the date of filing the initial complaint to the making of a final determination thereon. If an informal investigation exceeds sixty (60) days, the investigation file shall contain a written explanation by the Chief of Police stating the reasons necessitating additional investigation time. CPOC Procedural Rules (II)(A)(2)(d)(8).
- l. The formal investigation process shall not exceed one hundred twenty (120) days from the date of the filing of the citizen's complaint to the date upon which a final determination is made on the complaint. The Chief of Police shall provide a written explanation in the formal investigation report indicating the reasons necessitating additional investigation time for any formal investigation which exceeds one hundred twenty (120) days. CPOC Procedural Rules (II)(A)(2)(e)(10).

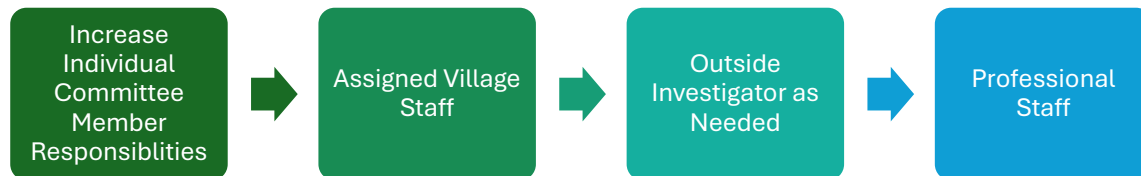
3. Capacity

As we examine how CPOC could increase its authority, capacity to perform additional duties and functions must also be considered. Some members of the Board of Trustees expressed concerns regarding expanding the CPOC authority when the CPOC has struggled to meet its current reporting requirements, with one report up to 18 months late. Currently, the CPOC is comprised of all volunteers who meet once per month and has a Staff Liaison who also serves as the Assistant Village Manager and HR Director. The Staff Liaison also serves as an intermediary between the Committee and the Police Department

Phase 1: Needs Assessment Report

if there is communication between meetings. The Staff Liaison is responsible for generating most of the data analysis the Committee reports in its semiannual reports. Depending on the model of oversight best suited for the Village of Oak Park, there will likely be a need to increase capacity for the all-volunteer CPOC, whether by increasing time demands on CPOC members or providing dedicated staff.

Figure 2: Range of increase in staff capacity to meet additional responsibilities



4. Stakeholder agreement on CPOC mission, vision, and function

A portion of the BerryDunn study focused on a number of recommendations that would directly affect the purpose of the CPOC and its oversight function. The report and the Request for Proposals spelled out some of the recommendations in detail. However, at the beginning of this process, stakeholders were not all in agreement on the potential functions of the CPOC. While the BerryDunn study is two years old, it becomes clear the importance of gaining consensus on the mission, vision, and function of the CPOC. Formalizing these items is essential as it will drive the remaining requirements needed to allow the CPOC fulfill the mandates placed upon it. Changes to the enabling legislation, allocated resources, and potentially structural change will be necessary to establish clear cut expectations that are achievable and sustainable into the future. As the function of the CPOC has changed little over the years, periodic assessments and review of the CPOC and its functions should also be strongly considered as community expectations regarding accountability, transparency, and oversight of law enforcement should also be expected to change.

Opportunities

1. Increase communication and collaboration

Board of Trustees

There are several areas where communication can be improved between the Committee, the Board of Trustees, the Police Department, and the public. The Procedural Rules and code only require the CPOC to communicate with the Board of Trustees on a semiannual basis. However, several Trustees wanted increased communication beyond the requisite



Phase 1: Needs Assessment Report

reporting with the CPOC. Trustees expressed concern about challenges voiced by the CPOC and felt that they could be a resource to reduce friction.

Police

Several stakeholders noted disrespect toward the Police Chief by some members of CPOC. This was noted by several stakeholders as contributing to a breakdown in communication and collaboration. Some of this can be attributed to personality and styles, but a lot of it can be attributed to emerging and unestablished oversight functions requested by the CPOC. In addition, there has been an undercurrent of tension stemming from George Floyd's murder and local community responses.

Clear cut authority for the CPOC will help alleviate this but clear, legislated stakeholder agreement on their individual roles, hierarchy and formalized reporting responsibilities, and community transparency and accountability expectations will assist in this natural tension. With trust at a low point and with limited interactions between the CPOC and the Police Chief, the CPOC's ability to impact policing is low. Procedural Rules determine the limits of the information provided to the CPOC and OPPD is less likely to accommodate requests which may seem to fall outside of their required mandates.

Further, most police department stakeholders outside of the Commander and the Police Chief who are very familiar with the CPOC expressed a lack of knowledge regarding the work of the Committee. Most had not watched or attended a CPOC meeting and were largely unaware of the CPOC's impact or lack thereof. All police stakeholders interviewed expressed a willingness for greater interaction with the CPOC on appropriate matters involving established authorities.

Community engagement and public awareness

Improvement and emphasis on communication between the public and the CPOC will enhance public trust in both the civilian oversight and law enforcement system. There seems to be limited public awareness of what the CPOC does. In 2021, the CPOC established a Communications Strategy aimed at strengthening police-community relations. A lot of work was placed in creating the draft plan but it has not been incorporated into the CPOC's duties and function. In reality, the area in which the CPOC could impact the community the most currently falls within the complaint process. However, the CPOC is currently restricted from knowing the identities of the complainants or the officers involved, presenting challenges in analyzing the effectiveness of the complaint process. Multiple stakeholders recognize the need for increased communication in the complaint process.



CPOC's ability to build public trust is hindered if the community does not fully understand what it does or how to engage with it. Recommendations will be developed that include community engagement and public awareness to ensure oversight efforts are visible, accessible, and actively communicated to the public.

2. Clear guidelines to CPOC

There is a provision in the Village Code that provides the Committee may report to the Village Board on special items of concern within its purview at any time or with any degree of frequency which the Committee deems appropriate or necessary.² However, there are no formal guidelines or expectations communicated when a special item report is made to ensure the CPOC's work will be effective. For instance, the Village President requested that the CPOC provide her a memo that provided an ascending/descending order of pros and cons regarding Flock cameras. Instead, the CPOC sent the Village President two separate memos – one in favor of renewing the contract and one in opposition, and which were based on two sets of data. The Flock camera system is a topic that was mentioned by every stakeholder group we interviewed and is an area the CPOC was tasked by the Village Board with reporting and advisement authority. However, the lack of clear definition regarding that authority has led to tension in how the required data is delivered to the CPOC.

The lack of a formal process to ensure that CPOC recommendations lead to action weakens the accountability function. CPOC provides its recommendations to OPPD informally at CPOC meetings and communicates with the Village Board in a limited capacity. This has led to CPOC receiving limited formal responses to their recommendations. There is no formal feedback loop where OPPD and/or the Village Board formally respond to the CPOC recommendations. There are no clear reporting guidelines outside of providing a semiannual report that the CPOC utilizes to provide recommendations. While the CPOC is counted on to provide recommendations regarding "Special Items of Concern," there is also not a formal process to elevate the concern so that urgent issues receive timely attention from Village leadership.

Over time, the CPOC's authority to review complaints has changed while the governing authorities have not. The CPOC previously had the authority to review internal complaints but that authority was informally removed in favor of the current practice of only reviewing citizen complaints. In recent years, the CPOC's review of complaints has expanded their access to BWC footage but the Rules and Procedures are vague in some areas and do not reflect the changes. Currently, the CPOC Rules and Procedures provides the Police

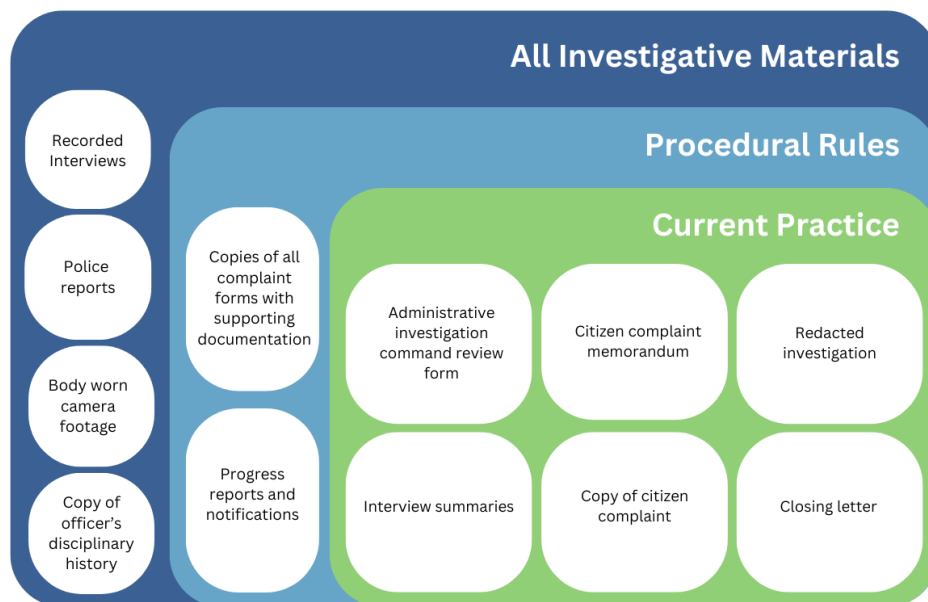
² Oak Park, Ill. GENERAL ORDINANCES OF THE VILLAGE, ch.2, art.30 §2(C)(2016).

Phase 1: Needs Assessment Report

Department, “shall report information to the CPOC which is of sufficient breadth and frequency to insure thorough and comprehensive reporting by the Committee to the Village Board on at least a quarterly basis.”³

In the January CPOC meeting, the Committee reviewed one case. Figure 3 illustrates the materials that the CPOC rules and procedures requires the Police Department provide to the CPOC, and what the Police Department actually provides. Further, there are other materials that may be generated within a complaint investigation that are not provided to the CPOC nor required to be provided by the Procedural Rules. Generally, the Police Department provides most of the complaint related materials listed in the Procedural Rules. However, the CPOC has also gained limited viewing access to BWC footage during CPOC meetings only, which did not exist during the creation of the Procedural Rules.

Figure 3: Complaint review materials



The CPOC receives some data from the OPPD related to its duties under the Village Code §2-30-2 to monitor the Police Department’s efforts in racial and cultural diversity in areas such as training, recruitment, promotions, and interpersonal relationships. OPPD provides CPOC with information on testing lists, training, Flock stops and searches. However, the data provided does not always include race and gender or changes in the different reports provided.

³ CPOC Procedural Rules (III)(B)(1).

Phase 1: Needs Assessment Report

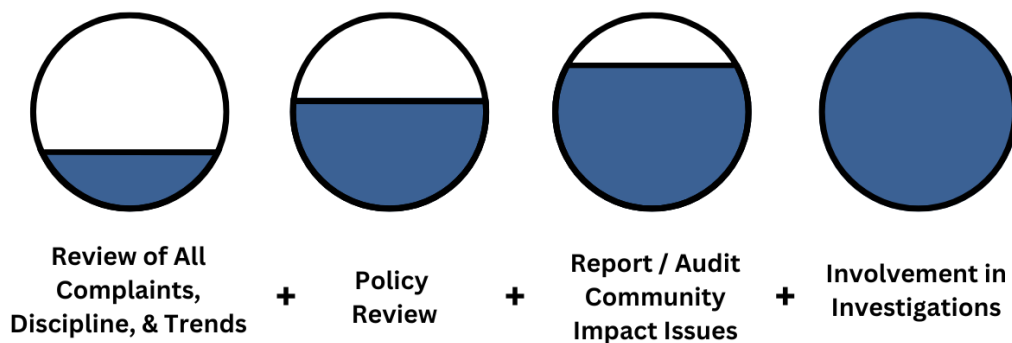
For example, in the January 2025 packet, the Police Department provided the CPOC with October through December 2024 Flock stops and searches. Flock data is deemed essential to CPOC’s assessment of police technology and whether communities of color are disproportionately affected. The Flock data table provided did not include race or gender. However, *The Field Stop Report, Traffic Stop Investigation, and Flock Analysis* all demonstrate significant racial disparities in stops, searches, and arrests. With 76% of Flock related stops including Black drivers. The Police Department also provided the CPOC with testing lists. One list is entitled “Fall 2023 Entry Level Test List” and the other is the “April 6th Test List.” The former includes gender and race and whether the candidate passed different parts of the hiring exam. The latter only had race and gender.

Without regular and standardized data, it is challenging for the CPOC to conduct an analysis over a period of time and report potential identified issues of racial and cultural diversity.

3. Update authorities and standardized training

As discussed above, the CPOC was created several decades ago and its purpose and function largely remained unchanged. However, policing and community expectations have greatly shifted in the last 30 years. Consistent with BerryDunn’s recommendation 5-4, where it recommended changes to the ordinance/charter to improve the CPOC’s value to the community, most stakeholders wanted or agreed that the CPOC’s function should include more than just citizen complaint review.

Figure 4: Potential range of increased CPOC duties mentioned by stakeholders



Part of updating and expanding CPOC’s authorities also requires increased training for CPOC members. Police stakeholders expressed a desire that CPOC members have some understanding of police practices, especially the practices employed by OPPD. Training opportunities identified included: ride alongs, attending roll call, attending the citizen’s academy, and/or observing department offered in-service training. The CPOC should also receive training as a police oversight entity so that each member is aware of all the



resources at their disposal and so they can work together in an efficient manner. Additional training from NACOLE can provide guidance on conducting police oversight; however, the final established role and function of the CPOC will largely determine the extent of oversight training required.

Threats

1. Independence

95% of CPOC's work is in complaint review. Many members of the CPOC do not feel like they can provide what they consider a true independent review of a complaint since a lot of the information they receive is maintained by the police. For example, they receive an Internal Affairs summary instead of the whole casefile and are only able to view BWC during a CPOC meeting that is controlled by a police representative. Additionally, some CPOC members said they receive such little information it is difficult to make a real decision and their vote to sustain or not sustain does not have an impact on the investigation since they are voting after the investigation and discipline are complete.

When asked about independence, there was general agreement that the decisions the CPOC were authorized to make were theirs alone. When it came to new and emerging areas of interest, the process became vague and many CPOC members felt stifled. Additionally, when asked what happens after the CPOC makes a recommendation to the Board of Trustees, most CPOC members did not know as the reporting relationship is one directional. The Board Liaison and the Village President both expressed that they could reduce this information gap if there were more communication from and with the CPOC.

Many different stakeholders questioned how CPOC members were appointed and wanted greater influence into that process and certain stakeholders were concerned about perceived bias on the Committee against the police. However, because the CPOC serves as an advisory committee to the Board of Trustees, the appointment process by the President was largely respected.

2. Checks and balances

Checks and balances are an essential part of accountability and police oversight. In order for the CPOC's input and feedback to have greater impact, a formal mechanism should be considered through which Committee members communicate their recommendations or requests to OPPD, with formal response required. Most issues discussed between Committee members and the Police Department during CPOC meetings are verbal and are rarely written and formally responded to. Furthermore, several Committee members said the Chief is not required to attend their meetings and questioned why that was. Several stakeholders stated the Chief's presence had not been welcomed by some CPOC



Phase 1: Needs Assessment Report

members or the Chief had not been treated with respect in meetings. The hierarchical relationship should be clearly established and both entities respected by the other. Clearly defined expectations of roles will help all parties involved manage expectations of each other and also ensure that proper decorum is maintained.

3. Political influence

Stakeholders from different groups expressed concerns of political influence on the CPOC with one stakeholder who said police oversight should be administered by professionals and not politicians. Concerns ranged from how members are appointed to how the CPOC is treated in regard to their authorities.

The way the Village receives and places committee applications gives the Village President discretion to assign an applicant to a committee, even if the individual did not necessarily apply for that specific committee. The current Village President appoints people to a committee to reflect different perspectives, and who represent the breadth of opinion in the community. However, because this is largely assigned to a specific political office, there is significant potential to impact the members of the Committee. One stakeholder said the Board is trying to keep the CPOC under their thumb and they are not independent where some board members recognize the CPOC as not having enough influence.

Of note, the appointment process is simple – the Village President nominates people with the support of the Community Involvement Committee (CIC), and they must be approved by a majority vote of the Board of Trustees. However, the ordinance creating CPOC created a removal process that is very structured and unique to the CPOC. In order to remove a CPOC member, written charges must be drawn up to initiate the removal. The Committee member shall have the opportunity to be heard in an open meeting before the Village Board. A majority vote shall be required to remove any such member from the Committee.

Other topics discussed by stakeholders

TOPIC	AGREEMENT	DISAGREEMENT
IMPORTANCE OF OVERSIGHT	All stakeholders agreed that citizen oversight is essential to public trust.	The nature of oversight—whether it should be cooperative or adversarial—was debated.
CPOC’S ROLE & AUTHORITY	CPOC should provide regular reports on police discipline and policy matters.	Some stakeholders felt CPOC should have expanded authority, while others believed its role should remain advisory. There were differing opinions on whether the CPOC should be a change

TOPIC	AGREEMENT	DISAGREEMENT
		agent or whether the CPOC oversees the work of the Chief.
TRANSPARENCY	The public needs to be able to trust the process is working. The CPOC website does not provide much information on its structure or process. It is unclear where complaints go after filed by the public.	Increased CPOC involvement in the complaint process (see below for additional).
MANDATE EXPANSION	Some stakeholders believe CPOC should have a larger role in policy-making.	Some believe the CPOC should be more involved in complaints and also be involved in community impact cases. Some argue that CPOC should focus on fulfilling its current mandate before expanding. Others were mindful about increasing administrative burden.
REPORTING & COMMUNICATION	Timely and clear reports are necessary for effective Board of Trustees oversight.	Reasons for report delays and whether CPOC needs additional resources or guidance were disputed.
COLLABORATION VS. CONFLICT	CPOC should not function as an inherently adversarial body.	Disagreements over whether tensions stem from structural issues or individual ideological differences.
FLOCK ALPR CAMERAS	The community's safety is a shared goal.	Strong disagreements over privacy concerns, effectiveness, and whether CPOC should weigh in on such policies.
DATA ANALYSIS	CPOC members are very interested in data surrounding issues of community concern. The Board generally finds the information highlighted helpful.	Some CPOC members felt that the analysis they performed only identified issues but they have no mechanism to make an impact. Some stakeholders see data analysis as a weakness of the CPOC and prefer to have a third-party perform evidence-based analysis.



TOPIC	AGREEMENT	DISAGREEMENT
COMPLAINT INVOLVEMENT	CPOC have a functioning review process. Most stakeholders want to see more timely investigations. CPOC's Rules and Procedures provide for the CPOC's involvement in the intake process.	CPOC should have a role in classification of allegations, involvement during the investigation process, access to officers/complainants, access to the entire investigative file, the public should have direct access to CPOC. In the current review system, stakeholders discussed providing feedback to the Chief prior to making disciplinary determinations and whether redacted files/video were appropriate.
INDEPENDENT INVESTIGATION	CPOC should have the option to initiate an independent investigation. Suggestions for the investigator include an independent investigator or a Village investigator.	

Appendix B - Phase 2: Best Practices and Research Report

VILLAGE OF OAK PARK
CITIZENS POLICE OVERSIGHT RECOMMENDATION

Phase 2

BEST PRACTICES RESEARCH REPORT



Table of Contents

I. Executive Summary	3
II. Models of Oversight	4
1. Review Model	5
2. Auditor/Monitor/Ombuds Model	5
3. Investigative Model	5
III. Methodology	6
IV. Summary of Research	6
A. <i>Review Model</i>	12
1. Burlington, VT – Police Commission	12
2. Cedar Rapids, IA – Citizen Review Board	12
3. Cambridge, MA – Police Review and Advisory Board	12
4. Champaign, IL – Citizen Review Subcommittee	12
5. East Lansing, MI – Independent Community Police Oversight Commission	12
6. Evanston, IL – Citizen Police Review Commission	12
7. Indianapolis, IN – Citizens’ Police Complaint Board	12
B. <i>Auditor/Monitor/Ombuds Model</i>	15
1. Madison, WI – Independent Police Auditor	16
2. Palo Alto, CA – Independent Police Auditor	16
3. Pasadena, CA – Independent Police Auditor	16
4. Santa Rosa, CA – Independent Police Auditor	16
C. <i>Hybrid Model</i>	17
Berkeley, CA – Office of the Director of Accountability and Police Accountability Board (Review and Auditor/Monitor)	17
V. Applicability to Oak Park	19
a. <i>Functional Areas and Duties</i>	20
1. Role and Authority	20
2. Member Qualifications and Training	20
3. Complaints and Investigations	21
4. Data Access and Analysis	21
5. Recommendations and Accountability	21
6. Community Engagement and Reporting	21
7. Dispute Resolution Mechanisms	22
8. Policy Review and Oversight of Other Areas in Policing	22
9. Resource Allocation and Capacity Building	22
10. Formalizing Procedures	22



Phase 2: Effective Practices Research Summary

VI.	Alignment with NACOLE's Effective Practices of Oversight	23
A.	<i>Detailed Findings: Effective Practices in Oversight</i>	23
1.	Transparent and Accessible Complaint Processes	23
2.	Procedural Justice & Legitimacy	24
3.	Comprehensive Access to Information	25
4.	Structured Stakeholder Engagement and Public Reporting	26
5.	Adequate Resource Allocation and Capacity Building	26
6.	Clearly Defined and Adequate Jurisdiction and Authority	27
7.	Evaluation and Continuous Improvement	27
B.	<i>Conclusion</i>	28

VII. Appendices

Appendix A - Oversight Agencies Functions and Duties Comparison According to Model
Appendix B - Oversight Heatmap Comparison Table
Appendix C - City Oversight Summary Table
Appendix D - Oversight Agencies Ordinances/Policies



I. Executive Summary

This report provides a comprehensive analysis of effective civilian oversight practices to enhance Oak Park's Citizens Police Oversight Committee (CPOC). Based on a detailed evaluation of local, regional, and national oversight models, the report identifies areas that are applicable in Oak Park's effort to update its oversight framework. The areas identified include:

1. Role and Authority
2. Member Qualifications and Training
3. Complaints and Investigations
4. Data Access and Analysis
5. Recommendations and Accountability
6. Community Engagement and Reporting
7. Dispute Resolution Mechanisms
8. Policy Review and Oversight in Other Areas of Policing
9. Resource Allocation and Capacity Building
10. Formalizing Procedures

The applicability to Oak Park was informed by a review of the National Association for Civilian Oversight of Law Enforcement's (NACOLE) effective practices in oversight. The effective practices include:

1. Transparent and Accessible Complaint Processes
2. Procedural Justice & Legitimacy
3. Comprehensive Access to Information
4. Structured Stakeholder Engagement and Public Reporting
5. Adequate Resource Allocation and Capacity Building
6. Clearly Defined and Adequate Jurisdiction and Authority
7. Evaluation and Continuous Improvement

Pivot conducted a comparative analysis that highlights similar functions and duties in various oversight models. These examples illustrate how different models, including review boards, hybrid structures, and auditor/monitor approaches, can be adapted to fit Oak Park's unique needs.

By learning from the effective practices of the identified oversight agencies, Oak Park can enhance its civilian oversight system to address transparency, accountability, and public trust in policing. These examples offer practical models and strategies that can be adapted to Oak Park's unique context, strengthening the CPOC's authority, capacity, and impact on police accountability.

II. Models of Oversight

According to NACOLE, there are three primary types of civilian oversight structures: (1) review model, (2) auditor/monitor/ombuds model, and (3) investigatory model. The hybrid model combines various aspects of the preceding models into a system unique to the jurisdiction in which it exists. Many, if not most, oversight agencies fall into the hybrid model in some fashion. There are other forms of oversight that mostly exist in larger metro areas. This includes hearing boards, administrative prosecutorial units, and systemic audits of high-risk police programs.

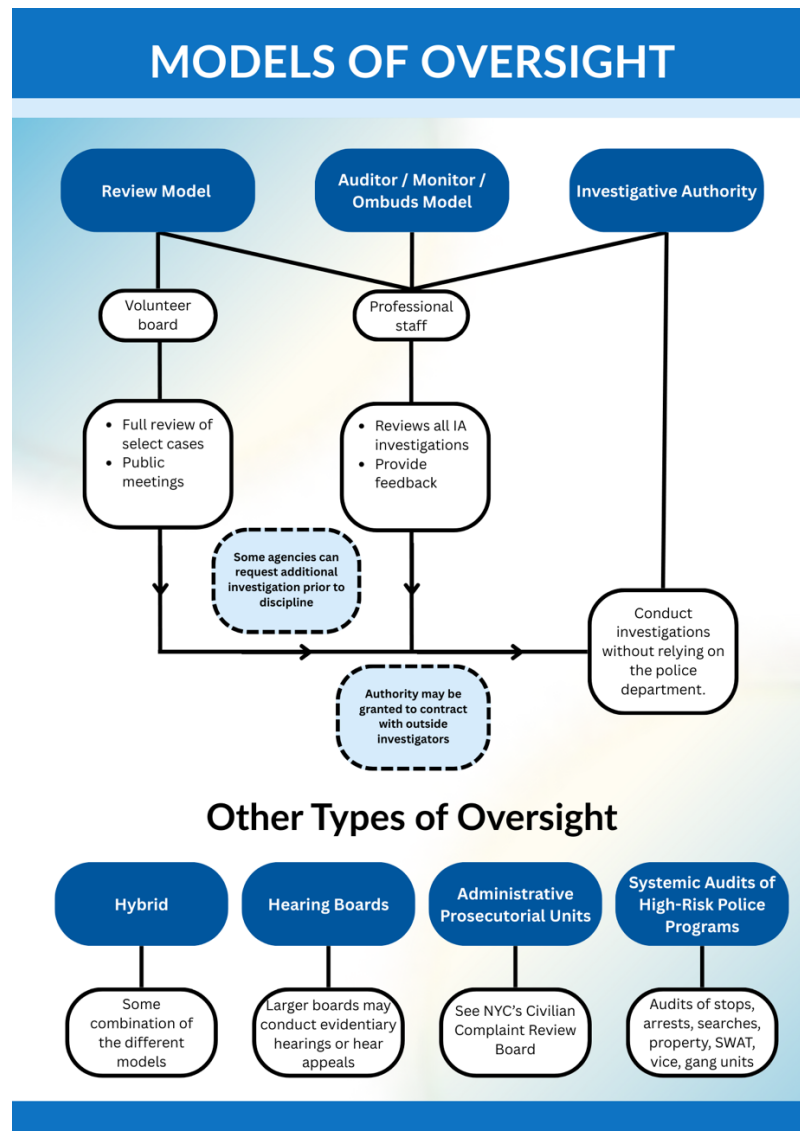


Figure 1: NACOLE's Models of Oversight



1. Review Model

The review model allows the oversight body to review closed cases. Upon completion of an Internal Affairs investigation of a complaint, an individual or a board¹ reviews the investigation, finds them adequate or not, and states whether it agrees with the findings. Often, boards may recommend further investigation and/or make policy and training recommendations. While volunteer agencies may only fully review selected cases, review boards with a professional staff may have the increased capacity to review all completed investigations and provide feedback. Review boards often hold their meetings in public but this can vary greatly depending on state law and union contracts. Although these types of agencies can provide greater transparency to the community and greater involvement from the community, they sometimes lack the independence needed to be deemed effective.

2. Auditor/Monitor/Ombuds Model

The auditor/monitor/ombuds model allows for the oversight agency to be actively engaged in many, if not all, of the steps related to the complaint process. The oversight entity is engaged in an ongoing process when a community member complains about the conduct of a police officer or a particular incident. These types of agencies can be effective in identifying weakness in the complaint investigation process, bias in investigations, gaps in training, policy and supervision within the department, and determining whether discipline is applied in a consistent and fair manner. They also allow for policies and procedures that are working well to be highlighted. In addition, they are often charged with collecting data. Many of these offices have wide data collection parameters, but the emphasis is looking at information broadly in an effort to promote systemic change.

3. Investigative Model

The investigative model allows the oversight entity to conduct independent investigations without reliance on the police department investigators. An oversight entity is authorized to investigate a class of complaints and allegations identified in its enabling ordinance. Investigations are conducted by trained and skilled investigators that work within the specific oversight agency or board. Agencies that rely on volunteers should not attempt to conduct investigations unless they have the authority to contract with outside, trained investigators. This model can be very effective in rebuilding trust when the local police department has lost the trust of the community. Investigators external to the police department negate the inherent real or perceived conflict of interest that may exist in internal investigations. However, this type of program is costly, police departments are often resistant to external investigations, and navigating local police union challenges may take additional time and political will to overcome.

The traditional models of oversight focus on specific complaint investigations and reviews. This approach may thoroughly address a specific issue or concern, but they are not the best method to identifying systemic issues. Most communities now realize that there is no one-

¹ Boards, commissions, and committees are referred to as a “board” in the report for consistency across the different oversight entities.



size-fits-all solution to civilian oversight. In recent years, civilian oversight agencies have increasingly expanded their scope to include, analyzing data, focusing on emerging community concerns, and evaluating other areas in policing. Oversight practitioners are finding it is more helpful to combine the different oversight authorities, ultimately leading to the creation of more hybrid models, combining additional authorities with the primary and original models of oversight.

III. Methodology

Our team reviewed 12 different civilian oversight systems. We began a general review of regional agencies that employed a review model similar to Oak Park. Then, to consider the full range of options, we expanded our review to the auditor/monitor/ombuds and investigative authority models with a focus on models implemented in smaller cities. We included one hybrid oversight agency with a large budget and scope of authority to examine what they offer that may be applicable to Oak Park. We then met with the Executive Director of NACOLE to discuss and identify different models of oversight that would be applicable for our review.

Based on the Needs Assessment, we felt the investigatory model and other less common types of oversight such as hearing boards and administrative prosecutorial units were less in line with Oak Park's needs. Instead, we focused our analysis on the review of audit/monitor/ombuds and hybrid models to provide options and facilitate Oak Park's assessment of what civilian oversight should look like moving forward.

IV. Summary of Research

Oak Park, Illinois	
Oversight Agency	Citizens' Police Oversight Committee
Oversight Type	Review model
Oversight Established	1991
Population	52,055 ²
Police Officers	86
Key Responsibilities	Reviews and refers citizen complaints; monitors police performance; advises the Village Board; serves as a forum for community engagement.
Berkeley, California	
Oversight Agency	Police Accountability Board and Office of the Director of Police Accountability
Oversight Type	Hybrid (Review model, staff, contractor(s))
Oversight Established	2020

² Population was taken from the most recent information from the U.S. Census Bureau.



Phase 2: Effective Practices Research Summary

Budget	\$1,698,417 ³ (2025)
Population	118,962
Police Officers	172
Key Responsibilities	<p>The board advises the public, City Council, and City Manager; conducts personnel hearings; approves staff findings and recommendations; makes recommendations to the Chief; may receive complaints and complaint appeals; conducts independent investigations; makes disciplinary recommendations; reviews policies and procedures; consults on the police budget; participates in Chief of Police hiring; and has subpoena authority.</p> <p>The Office of the Director of Police Accountability accepts and investigates complaints filed by members of the public; reviews police investigations; offers mediation; makes findings and recommendations to the board; may appeal complaints; may hire a consultant or contractor; and conducts stakeholder engagement.</p> <p>Both the board and Director have required training.</p>
Relevance to Oak Park	Berkeley's comprehensive training requirements and policy review capacity could enhance CPOC's authority, transparency, and impact.
Burlington, Vermont	
Oversight Agency	Board of Police Commissioners
Oversight Type	Review model
Oversight Established	2016
Budget	Unknown
Population	44,528
Police Officers	105 authorized
Key Responsibilities	The board supervises the police department, exercising the authority and responsibility for the management of the police department, its services and facilities, as delegated by resolution of the Burlington City Council. Receives complaints and reviews selected materials related to police investigations; may request additional information, request the chief to reconsider their actions, or make recommendations related to an investigation; hears appeals of decisions by the police chief to dismiss,

³ <https://berkeleyca.gov/sites/default/files/documents/FY-2025-2026-Proposed-Biennial-Budget.pdf>



Phase 2: Effective Practices Research Summary

	suspend, or demote an officer; make disciplinary determinations; conduct hearings; analyze data into racial disparity; participate in chief hiring.
Relevance to Oak Park	Burlington's data analysis focus, structured engagement, and policy review capacity could help strengthen CPOC's ability to address systemic concerns.
Cambridge, Massachusetts	
Oversight Agency	Police Review & Advisory Board
Oversight Type	Review model
Oversight Established	1984
Budget	\$122,418 (2025)
Population	118,213 (2023)
Police Officers	278
Key Responsibilities	Receives and submits complaints for investigation and/or mediates citizen complaints involving officers; staff monitors investigations of submitted complaints conducted by the police department and the board reviews the investigative findings, issues recommendations regarding the findings, training, and revisions to departmental policies and procedures; holds hearings when a complaint remains unresolved after an investigation; has subpoena authority and reviews the police budget prior to its submission to the city manager; reports quarterly to the city manager, mayor, and city council.
Relevance to Oak Park	Provides oversight by monitoring and reviewing police investigations with full access to all information, demonstrating robust complaint review, mediation, and an oversight authority supported by comprehensive board training.
Champaign, Illinois	
Oversight Agency	Citizen Review Subcommittee
Oversight Type	Review model
Oversight Established	2017
Budget	Unknown
Population	89,189 (2023)
Police Officers	127 sworn
Key Responsibilities	Reviews complaints prior to Chief's disciplinary determination; reports findings to the Chief; prepares an annual report detailing activities, findings, and any policy recommendations; and engages in public outreach and education.



Phase 2: Effective Practices Research Summary

Relevance to Oak Park	Champaign has a similar council-manager form of government as Oak Park. Functionally, Champaign's subcommittee has access to the entire complaint investigation and has a more formal complaint review process. The subcommittee can also request the issuance of a subpoena but this does not apply to officers. The subcommittee makes recommendations but only during its annual report. It is unclear whether their recommendations receive formal responses.
Cedar Rapids, Iowa	
Oversight Agency	Citizen Review Board
Oversight Type	Review model
Oversight Established	2021
Budget	Unknown
Population	135,958 (2023)
Police Officers	220+ sworn
Key Responsibilities	Receives complaints and monitors a system for tracking complaints; reviews police investigations; advises on complaint dispositions; makes disciplinary recommendations; assesses officer conduct; conducts hearings; reviews racial disparity, traffic stops and arrests, and identify and analyze trends; makes findings and recommendations; hosts community forums; conducts independent investigations; and has 20% representation on the police hiring committee.
Relevance to Oak Park	Cedar Rapids' focus on data-driven oversight and racial equity aligns with Oak Park's goals for more equitable policing practices.
East Lansing, Michigan	
Oversight Agency	Police Oversight Commission
Oversight Type	Review model and staff (2 Council Liaisons, and 1 staff resource for Diversity, Equity, Inclusion & Organizational Culture)
Oversight Established	2021
Budget	Unknown
Population	48,528 (2023)
Police Officers	43 sworn
Key Responsibilities	Review complaints, policy recommendations, data collection and analysis, community engagement, and annual reporting.
Relevance to Oak Park	East Lansing's legislative framework and emphasis on transparency demonstrate the importance of



	formalizing CPOC's access to information and authority.
Evanston, Illinois	
Oversight Agency	Citizen Police Review Commission
Oversight Type	Review model with staff support from the Office of Professional Standards
Oversight Established	2019
Budget	Unknown
Population	75,070 (2023)
Police Officers	134
Key Responsibilities	Promoting public confidence, provides a citizen perspective, reviews investigations, facilitates continuous improvement.
Relevance to Oak Park	Evanston's community-focused oversight and training requirements highlight opportunities to enhance Oak Park's CPOC with similar reforms.
Indianapolis, Indiana	
Oversight Agency	Citizens' Police Complaint Board and Citizens' Police Complaint Office
Oversight Type	Review model and 2 staff
Oversight Established	1989
Budget	\$276,000 (2021)
Population	879,293 (2023)
Police Officers	1,464 sworn
Key Responsibilities	Receives complaints and conducts concurrent investigations; makes complaint dispositions; conducts hearings; mediation; makes recommendations; seeks community input on recommendations; conducts independent investigations; has subpoena authority.
Relevance to Oak Park	Indianapolis' independent complaint intake process and concurrent investigations could enhance objectivity and transparency in Oak Park's oversight system.
Madison, Wisconsin	
Oversight Agency	Independent Police Monitor
Oversight Type	Monitor (2 staff and review board)
Oversight Established	2020
Budget	\$399,764 (2025)
Population	280,305
Police Officers	483 sworn
Key Responsibilities	Oversees police compliance, reviews use of force incidents, processes community generated



Phase 2: Effective Practices Research Summary

	complaints, investigates police personnel, appoints legal counsel for complainants, and supports the board.
Relevance to Oak Park	Madison's emphasis on procedural fairness and transparent community engagement can enhance trust and legitimacy in Oak Park's CPOC.
Palo Alto, California	
Oversight Agency	Independent Police Auditor
Oversight Type	Auditor (contracted)
Oversight Established	2006
Budget	\$97,500 (2021)
Population	65,882 (2023)
Police Officers	85
Key Responsibilities	Receives complaints; reviews complaints by the public; audits use of force investigations; may make recommendations on investigations, findings, training, and policy modifications; semi-annual reporting to City Council; and semi-annual meetings with City Council to discuss trends, recommendations, and other Council concerns.
Relevance to Oak Park	Palo Alto's model highlights how contracted professionals can supplement civilian oversight bodies with specialized investigative capacity.
Pasadena, California	
Oversight Agency	Independent Police Auditor
Oversight Type	Auditor (contracted) and review board
Oversight Established	2020
Budget	\$150,000
Population	133,560
Police Officers	241 sworn
Key Responsibilities	Advisory role, access to investigations, use of force reviews, bias-based policing investigations, policy recommendations, public reporting, subpoena power.
Relevance to Oak Park	Pasadena's approach demonstrates how combining a professional auditor with community-based review boards can strengthen oversight capacity and public trust.
Santa Rosa, California	
Oversight Agency	Independent Police Auditor
Oversight Type	Auditor (contracted)
Oversight Established	2021
Budget	90,000 (2021)
Population	175,845 (2023)



Police Officers	181
Key Responsibilities	Reviews all administrative investigations and officer involved shooting investigations; may recommend an independent investigation on allegations of excessive force, violation of civil rights, or other wrongful conduct; full access to information as the Professional Standards Team relating to investigations; written evaluation of complaint investigations; issues recommendations on policy, procedures, or training; receives complaints; receives notifications of death, serious injury, or other critical incidents; audits misconduct complaints and discipline process; audits policies, procedures, and training; annual audits; annual review of policies and procedures; systematically reviews training; issues procedure reports; conducts independent investigations; and community outreach.
Relevance to Oak Park	Santa Rosa's systemic review process could enhance the CPOC's investigative scope and accountability mechanisms.

A. Review Model

a. Agencies Reviewed

1. Burlington, VT – Police Commission
2. Cedar Rapids, IA – Citizen Review Board
3. Cambridge, MA – Police Review and Advisory Board
4. Champaign, IL – Citizen Review Subcommittee
5. East Lansing, MI – Independent Community Police Oversight Commission
6. Evanston, IL – Citizen Police Review Commission
7. Indianapolis, IN – Citizens' Police Complaint Board

No single model reviewed presented an exact blueprint. Instead, we identified agencies that excelled in certain areas and present practices and authorities that align with Oak Park's civilian oversight needs. Pivot selected Champaign, IL, Cambridge, MA, East Lansing, Michigan, and Evanston, Illinois for their size, geographic location, and having an existing review model of civilian oversight.

Champaign and Cambridge's review boards review complaint investigations before the investigation is closed. Cambridge's review board is well established, having been in existence for over 40 years, and has a strong complaint review system. The board is responsible for the complaints made directly by the board. However, the police department conducts the complaint investigations. The police send a report to the board who may then



Phase 2: Effective Practices Research Summary

accept or require additional investigation. The board then votes on whether there is a violation of policy and procedures. Champaign has a review board that has a complaint review function more robust than Oak Park that would not be difficult to implement. However, it appears the board only makes recommendations once per year in its annual reports which could reduce the efficacy of the recommendations.

East Lansing's enabling ordinance gives its oversight entity a wide range of jurisdiction in police oversight. Additionally, it provides detailed and extensive reporting on its website for public viewing, increasing transparency and accessibility to the oversight process. Evanston's functions and duties are similar to Oak Park but is more community-oriented in its purpose. They have a "timely, fair, and objective" review standard for complaints and list what the board should be evaluating when it makes its determination. They also have training requirements for new appointees. Evanston, however, faces similar restrictions to access of police information and a limited scope of authority. Further, the Evanston model would not offer a significant change to the current oversight system in Oak Park.

Pivot selected the Burlington Police Commission (BPC) in Burlington, Vermont for its data analysis, policy review authority, and as an example of a different form of training compared to other oversight entities. The BPC receives police data from the city and then provides an assessment of the data. The BPC has broad authority to review and approve policy and procedure changes and a training mandate that includes educational sessions with speakers from various aspects of public safety. In addition, the police department responds to their annual reports in writing.

Cedar Rapids, Iowa was selected for its data analysis. They use data to find trends in policing whose origins may be rooted in bias or other systemic phenomena and use the information to make recommendations. They received training from NACOLE on how to analyze data. Lastly, Indianapolis, Indiana was selected for their ability to review all investigations. Even with a small staff that includes a director and intake specialist, they review complaints prior to the disciplinary process and have access to police data to conduct analysis.

Typical functions and duties of this model include:

1. Requests for additional investigation
2. Subpoena power
3. Issue reports and recommendations
4. Community outreach
5. Public meetings

What is lacking in these functions is any enforcement mechanism to ensure compliance with these duties by the agency overseen.

b. Similar Authorities

1. Purpose. Most of the review models reviewed had a "Purpose" or "Intent" or "Established" section. This is where an oversight entity describes its mission and values. A detailed



Phase 2: Effective Practices Research Summary

purpose statement will be essential in establishing the necessary authorities for Oak Park in its enabling legislation.

2. Member qualifications. Most of the agencies have member qualifications that clearly establish the criteria for appointment to the oversight body (East Lansing, Evanston, and Cedar Rapids).⁴
3. Board training requirement. All review models examined have a board training requirement. Some boards have an initial training and subsequent training. The number of hours of required training varies. Most board training involves some coordination with the police department to familiarize board members with police practices. Other boards opted to get their training through NACOLE or hold an educational series of speakers.
4. Complaints. All the boards receive complaints in some form; however, Indianapolis has a complaint office that receives complaints.
5. Conduct hearings. Of the agencies reviewed, BPC is the only agency that holds disciplinary hearings. Cambridge has the ability to hold a hearing for appealing complaint investigation outcomes. East Lansing's hearings are more akin to community outreach events. While Indianapolis holds public meetings where statements may be provided, the process is more for board deliberation after a case review.
6. Mediation. Not many agencies reviewed have a mediation component. Cambridge and East Lansing mediate complaints between the complainant and officer. While the mediation used in Indianapolis is more for the Chief and the board when they disagree.
7. Independent investigations. Cedar Rapids allows for the referral of a complaint when the board and Police Chief cannot reach an agreement, while Indianapolis has their own investigator who conducts concurrent investigations to the police department. Then, East Lansing has an extensive number of subject matter that the board can independently investigate. Cambridge's ordinance provides for a board investigator who can conduct an independent investigation on behalf of the board. This was the practice 25 years ago but has not been the practice in recent memory. Instead, the police conduct the investigations of complaints.
8. Recommendations. Most boards make recommendations to the Chief during the complaint review process. Recommendations range from taking a particular action in the investigation, the result of the complaint, or procedural recommendations. East Lansing's ordinance lists several areas outside of the complaint process the board may make recommendations.
9. Independent contracts. East Lansing and Burlington provide for independent contracts with investigators and professional researchers. Cambridge's ordinance allows for the board to contract, from time to time, for additional staff necessary to carry out its duties.
10. Data. Cedar Rapids stood out amongst the review model agencies for its emphasis on data. Their board reviews data and then makes recommendations based on the trends identified through the data.

⁴ The enabling legislation for the Burlington Police Commission was not located, the only publicly available document is, "The Role of the Burlington Police Commission in Reviewing Complaints Against Employees." Adopted August 25, 2020.



11. **Reporting.** To provide impactful reporting, it is important to adequately address an oversight body's access to information. East Lansing's establishing ordinance provides for cooperation by the city employees when the board requests information. Champaign provides the board with the ability to request a subpoena be issued for citizen-witness testimony or records that were not obtained voluntarily. Materials presented during executive session may be made available for review at the request of any member of the board and completing a fingerprint-supported background check and a confidentiality agreement may provide further information to board members (Burlington).
12. **Board with staff support.** All boards reviewed receive some support staff from the city and/or police department. Indianapolis has a complaint office that supports the board. East Lansing explicitly lists their staff support as two Council Liaisons and one staff resource for diversity, equity, inclusion, and organization management. Cambridge has two staff but the staff are shared with another department. Champaign is provided support staff by the Equity and Engagement Department, but the assistance is limited to ensuring meeting minutes are properly recorded. Evanston and Cedar Rapids receive administrative support from the police department. However, board members from Cedar Rapids expressed concerns about being too reliant on the police.⁵
13. **Dispute resolution.** When the Police Chief rejects the board's recommendations. The Police Chief will provide the board with an explanation of why the recommendation was not accepted. If a majority of the board disagrees with the Police Chief's decision, the board may take the matter to the mayor (Burlington).

B. Auditor/Monitor/Ombuds Model

The second oversight model is the auditor/monitor/ombuds model. These systems allow for the oversight agency to be actively engaged in individual steps, if not the entire complaint process. This model provides for some form of ongoing review or audit of the complaint process. A complaint is initiated when a member of the community complains about a police employee's conduct in a particular situation to either the police department or to the oversight agency.

This model can be effective in identifying strengths and weaknesses in how complaints are handled and identifying other areas for improvement, such as bias in investigations or identifying gaps in training, policy and supervision, and whether discipline is consistent and fair. These models are often complaint driven and charged with data collection and reporting on trends. However, very little data comes from complaints. It is difficult to globally analyze issues in policing with complaint data alone.

This model is used across large and small jurisdictions. It can be pared down to a few essential functions performed by a contracted professional and it can be scaled up to a professional office with a director and staff. Some auditor/monitor/ombuds models are the only civilian oversight mechanisms in a jurisdiction, and some are paired with a board of volunteers making up an oversight board/committee/commission. The board/committee/commission either works in tandem with the oversight agency, has an

⁵ <https://www.kcrg.com/2024/08/14/former-cedar-rapids-review-board-members-crb-isnt-working-effectively/>



Phase 2: Effective Practices Research Summary

advisory role to the oversight agency, or the oversight agency reports to the board. Functions and duties of this model include:

1. Complaint intake
2. Involvement in the investigation process
3. Review of police investigations using a “timely, thorough, and objective” or similar standard
4. Access to police information
5. Recommendations for improving police investigations, policies, and procedures
6. Use of force review
7. Reporting
8. Community engagement

Madison, WI is the largest city we reviewed of an auditor/monitor/ombuds model with a professional staff. We reviewed this office because it is a regional example with some practices that are worth noting, such as the board evaluating the work of the monitor and conducting an annual review of the Police Chief. Then, we looked at a group of contracted police auditor positions – Pasadena, CA, Santa Rosa, CA, and Palo Alto, CA – as examples of smaller cities that want an oversight entity in their community but on a scale that make sense for them.

a. Agencies Reviewed

1. Madison, WI – Independent Police Auditor
2. Palo Alto, CA – Independent Police Auditor
3. Pasadena, CA – Independent Police Auditor
4. Santa Rosa, CA – Independent Police Auditor

b. Similar Authorities

1. Complaints. There are differing standards regarding receiving complaints. Palo Alto and Santa Rosa receive complaints directly from the public while Pasadena and Madison do not. Similarly, there are varying standards regarding which complaints are reviewed by the oversight agency. Palo Alto only reviews complaints by the community, Madison and Santa Rosa review all administrative investigations, and Pasadena reviews investigations of personnel complaints of bias-based policing. Generally, the agencies use the standard “thorough, fair, and objective,” or similar language in their evaluation of investigations.
2. Access to information. All agencies reviewed have access to police records. One agency only has access to investigations of complaints filed by the community. Three of the four agencies have access to all police records related to a complaint. However, only Madison has access to all police records.
3. Recommendations. All agencies reviewed make recommendations concerning the improvement or changes to police policies, procedures, or training. Some agencies



specify when recommendations can be made, such as before or after an investigation. Madison can make recommendations to address any issues of concern.

4. Independent investigations. Both Santa Rosa and Madison have the authority to conduct independent investigations. However, the matters that can be investigated vary from complaint investigations, excessive force, civil rights violations, to any misconduct matter requested by the board.
5. Use of force review. All agencies we reviewed review police uses of force. However, the types of force subject to the auditor's review vary across the agencies from the intentional pointing of a firearm to an officer involved shooting. Most agencies review the police investigations into force to a similar "timely, thorough, and objective" standard like in complaint investigations.
6. Reporting. All agencies reviewed have a reporting requirement. Some agencies are required to report on a semi-annual or annual basis and Madison can report on other matters. The focus of the reports varies from summarizing investigations reviewed to reporting on statistical trends. Madison also has reporting requirements beyond its annual report.
7. Community engagement. Madison and Santa Rosa require the auditor/monitor to engage with the community. Pasadena has a board, and it assigns community engagement to the board. Palo Alto does not have a community engagement component.
8. Board. Madison and Pasadena both have a board component. The duties and functions include:
 - a. Receive briefings (Pasadena)
 - b. Monitor and publish statistics (both)
 - c. Receive reports (both)
 - d. Approve recommendations (both)
 - e. Community engagement (both)
 - f. Administer oaths and subpoenas (both)

C. Hybrid Model

a. Agency Reviewed

Berkeley, CA – Office of the Director of Accountability and Police Accountability Board (Review and Auditor/Monitor)

Berkeley's police accountability system is a hybrid model with both a civilian review board and a civilian director who also serves as the administrative support for the board. The current police accountability system was approved by voters in November 2020 by a City Charter amendment. This replaced the Police Review Commission, the previous civilian review board that had been in place since 1973.

Pivot reviewed Berkeley as an example of the hybrid model. The professional staff conducts most of the oversight work and then presents its recommendations and findings to the board who makes the final determination or recommendation to the Mayor, City Council, and/or Police Chief. While Berkeley has a larger population and police department and has a tremendous budget for a city of its size as compared to Oak Park, it illustrates the capacity of



an oversight agency with a large budget. Oak Park can benefit from the board training program and some of the formalized structures Berkeley uses such as receiving reports from the police, police attending meetings, and the prescribed number of days for each party to respond when requests are made that require follow up.

b. Board authorities

1. Recommendations. The director advises and makes recommendations to the public, City Council, and City Manager on police operations including all written policies, practices, and procedures. The board reviews and approves the director's findings and recommendations and makes recommendations to the Chief. The board may make recommendations to the City Council for enacting legislation or regulations that will further the goals and purposes of police accountability. The board is also empowered to review and make recommendations to the City Council on the police budget. The Chief of Police submits a final budget proposal to the board for their review and recommendations.
2. Investigations. The director independently investigates publicly generated complaints against sworn Berkeley Police Department employees.
3. Objectivity requirement. To be appointed, board members must be fair minded and objective with a demonstrated commitment to community service. Board members are required to maintain basic standards of fair play, impartiality, and avoid bias, and the appearance of bias.
4. Board membership. The City Council is responsible for establishing a board that is broadly inclusive of race, ethnicity, age, gender identity, sexual orientation, economic status, neighborhoods, and various communities of interest in the city.
5. Term limits. Board terms end four years after appointment or upon the expiration of the nominating City Council member's term, whichever is earlier. Board members are limited to serving eight consecutive years and may be reappointed after a break in service of at least two years.
6. Stipends. Board members are entitled to receive stipends:
 - a. \$100/each for regular and special meetings
 - b. \$20/hour for each hour of training attended
 - c. Stipend may not exceed \$300/month per board member
7. Training requirements. Training requirements for board members are established by the director. The Police Chief has input on board training and can attend all training. Board members must complete within the first six months of appointment and receive a minimum of 40 hours of training in:
 - a. Quasi-judicial duties and obligations of the board
 - b. Constitutional rights and civil liberties
 - c. Fundamentals of procedure, evidence, and due process
 - d. The Public Safety Officers Procedural Bill of Rights Act
 - e. Police department operations, policies, practices, and procedures
 - f. Duties, responsibilities, procedures, and requirements associated with all ranks and assignments.
8. Policy review. The Police Chief shall submit newly adopted policies and revisions to the board for review. The board may review policies, practices, and procedures:



- a. In its discretion
 - b. Upon request of a member of the public
 - c. Due to a policy complaint
 - d. Due to a complaint from a member of the public against an officer.
9. Receive written reports from the Berkeley Police Department. The board receives reports from the Chief on subjects and intervals in consultation with the Chief. At least once per year, the board receives a report on all use of force statistics, the number of complaints filed with Internal Affairs, the allegations in each complaint, and the disposition of closed complaints, including any discipline imposed.
10. Complaint objection process. The board may issue a report when it dismisses an objection. Alternatively, if the board disagrees with the Chief, the board issues a report to the City Manager addressing its concerns or objections. The City Manager makes a final determination and provides a written explanation. Any discipline shall not be administered while a complaint is contested.
11. Subpoenas. The board may issue subpoenas.
12. Hiring of Police Chief. The board shall be consulted during the hiring of the Chief.
13. Police attendance of meetings. The Police Chief or command staff is required to attend board meetings to the maximum extent possible, at least once per month and a minimum of 12 meetings per year. A designee attends in the Chief's absence.
14. Police attendance of board meetings. To the maximum extent possible, the Police Chief is required to attend at least one regular board meeting per month when held and a minimum of 12 meetings per year. The Police Chief sends a member of the command staff to attend any regular board meeting the Police Chief does not attend.

V. Applicability to Oak Park

In Phase 1 of this project, Pivot conducted a needs assessment based upon a review of the CPOC's governing documents, various other documents and studies, a site visit and in-person observations of a CPOC meeting and complaint review, and stakeholder meetings with CPOC, Police, Village leaders, and members of the Board of Trustees. Using a strengths, weaknesses, opportunities, and threats (SWOT) analysis, several areas of emphasis were identified which would strengthen or enhance Oak Parks system of civilian oversight of police.

Recognizing that strengths and weaknesses are defined as internal aspects in a SWOT analysis, Pivot identified several strengths of the CPOC: functioning complaint review process established over multiple decades, relatively recent increased access and influence, and its status as a recognized established entity within Oak Park.

Pivot identified the CPOC's scope of duties, noting the lack of clarity for the expansion of duties, specifically referring to the "special items of concern," the lack of a structured mechanism to evaluate police strategies, policies, training, or new technologies. Pivot also noticed that there is a lack of adherence to the established CPOC Procedural Rules. The Procedural Rules were set many years ago and substantive and impactful changes have been enacted which have impacted the duties of the CPOC. Finally, Pivot looked at CPOC's



Phase 2: Effective Practices Research Summary

capacity to take on additional duties and functions and identified this as a potential area of concern.

Opportunities and threats are areas which are external to an organization in a SWOT analysis. Pivot Identified increased communication and collaboration with the Board of Trustees, police, and the community to include an emphasis on community engagement as opportunities to increase the effectiveness of the CPOC. We also saw that establishing clear guidelines and formalizing processes for the CPOC would likely increase cooperation from outside entities so that their authorities would no longer be questioned, requests would be responded to in a timely manner, and proper reporting would occur both to and from the CPOC by the police and the Board of Trustees. Various stakeholders had differing ideas as to what the scope of authority of the CPOC should be. This should be clearly established in city code. As circumstances change and updates to the authorities are needed, authorities should be properly legislated and resourced to ensure success. Finally, a formal training program for CPOC members will increase credibility and trust between the CPOC, the police department, and the community.

Finally, Pivot identified independence, checks and balances and political influence as external threats against effective oversight by the CPOC. These are bigger picture items that may cause harm if not recognized and kept in check as it is quite difficult to eliminate them entirely in any system of government as they require each other to some degree. For example, committee members will always be appointed by elected officials, but elected officials should allow committee members autonomy in their decisions.

a. Functional Areas and Duties

NACOLE has established effective practices for civilian oversight of law enforcement. Moving toward Phase 3 of this project, Pivot identified the following functional areas to consult and collaborate with stakeholders on to develop the most appropriate recommendations for enhancing oversight in the Village of Oak Park:

1. Role and Authority

A detailed purpose statement and clear delineation of the necessary authorities for Oak Park must be clearly outlined in its enabling legislation.

2. Member Qualifications and Training

- a. Member qualifications. Various stakeholders discussed transparency in the selection process and the need for establishing a broadly inclusive committee.
- b. Member objectivity requirement. To be appointed, committee members must be fair minded and objective with a demonstrated commitment to community service. Committee members are required to maintain basic standards of fair play, impartiality, and avoid bias, and the appearance of bias.
- c. CPOC training requirement. Almost every stakeholder interviewed saw the need for formalized training for CPOC members.



3. Complaints and Investigations

- a. Complaints. CPOC's role in complaints is well established. However, the review is currently limited to community complaints. Review of internal complaints is written in the Procedural Rules as falling under CPOC authority. There is also significant interest in complaint intake and feedback from complainant's regarding the complaint process.
- b. Independent investigations. There is some interest in the ability to independently investigate cases when the CPOC and Police Chief cannot reach an agreement. This function will likely need to be a contracted element if it comes to fruition in Oak Park.

4. Data Access and Analysis

- a. Data. This is a significant area of interest from various stakeholders, especially that pertaining to the FLOC system. How to deal with this and other emerging technologies came up in every single conversation that Pivot had with stakeholders.
- b. Access to information. The CPOC has access to some police information, but only if it is provided by the police department and redacted. Consideration should be given to legislating access to information to CPOC members or staff support to ensure proper oversight can occur.

5. Recommendations and Accountability

It is a common practice of oversight agencies to make recommendations regarding investigations, training, policies, and procedures to the police department that they oversee. Stakeholders recognized the need for this but also stated the lack of response to recommendations and questions by the police as a significant concern. A formalized process for making, responding to, and monitoring compliance with recommendations will elevate the CPOC's relevance and overall effectiveness in Oak Park.

6. Community Engagement and Reporting

- a. Structured community engagement. Requirements for community engagement should be established that will help legitimize the work of the CPOC, the complaint process, and transparency and accountability measures taken with the community.
- b. Transparency in reporting. Procedures surrounding public posting of reports, recommendations, and responses should be considered to increase transparency of the CPOC's efforts to the public.
- c. Reporting. CPOC already provides semi-annual reports. Defining the scope of reporting on "special items of concern" will need to be established moving forward.



7. Dispute Resolution Mechanisms

Clarity will need to be provided for how to handle disputes or a lack of response to formal requests from the CPOC.

8. Policy Review and Oversight of Other Areas in Policing

- a. Policy review. Stakeholders were split regarding CPOC oversight on police policy. A standard for policy review should be considered.
- b. Use of force review. Community impact cases, including police uses of force are commonly reviewed by oversight agencies. This has not been a common occurrence in Oak Park and should be considered moving forward.
- c. Hiring of Police Chief. The CPOC should be consulted during the hiring of any new Chief.
- d. Other areas. The CPOC's focus is primarily on complaints but can be expanded to include other areas in policing if it is a "special items of concern." However, this catch all provision should be reserved for special cases and expanding CPOC's regular function should be considered. Other oversight agencies have oversight on racial disparity; traffic stops; arrests; resisting and obstructing; disorderly conduct; police response to mental/behavioral health crisis; encounters with people experiencing homelessness; availability of unarmed emergency response services; hiring, training, and promotions; biased based policing; 911 dispatch system; early intervention system; Brady lists; monitoring compliance with recommendations; and conducting a pattern and practice analysis.

9. Resource Allocation and Capacity Building

- a. Independent contracts. This is an area that deserves exploration. While the number of community complaints received are in line with the capacity of the CPOC, a contractor could significantly enhance oversight of other police functions, including oversight of emerging technology including the FLOC cameras and additional data analysis.
- b. Staff support. The CPOC currently has an assigned staff liaison from the Village. It is worth exploring whether this is the right fit for the CPOC, whether there is a more appropriate employee that could provide staff support, or whether the Village should hire stand-alone staff to support to the CPOC operationally, provide data analysis, and assist them in other functions to increase their effectiveness and independence.
- c. Stipends. Due to the significant time commitment for committee members, a tiered stipend may be appropriate.

10. Formalizing Procedures

- a. Receive written reports from the police department. Establishing a robust information sharing process from the police chief to the CPOC will enhance credibility of both the police department and the CPOC.



- b. Receive reports on critical incidents from the Police Chief. Procedures regarding formal reports from the police chief to the CPOC on matters of great public concern should be established.
- c. Police attendance of meetings. Stakeholders expressed some consternation regarding the lack of attendance to CPOC meetings by the Police Chief. Conversely, several stakeholders expressed concern at the lack of decorum exhibited by some members of the CPOC towards the Police Chief. Rules and guidelines should be clearly established moving forward.

VI. Alignment with NACOLE's Effective Practices of Oversight

Our analysis of peer oversight programs reveals several effective practices, out of many others, that are particularly relevant for enhancing civilian oversight in Oak Park. The practices below will serve as the basis for our subsequent recommendations:

1. Transparent and Accessible Complaint Processes
2. Procedural Justice & Legitimacy
3. Comprehensive Access to Information
4. Structured Stakeholder Engagement and Public Reporting
5. Adequate Resource Allocation and Capacity Building
6. Clearly Defined and Adequate Jurisdiction and Authority
7. Periodic Evaluation and Continuous Improvement

Each of these principles and practices has been identified as a critical component of effective oversight programs.⁶ The following section provides a detailed discussion of each effective practice, including its rationale, implementation considerations, and anticipated impact on the oversight process in Oak Park.

A. Detailed Findings: Effective Practices in Oversight

1. Transparent and Accessible Complaint Processes

Transparent and accessible complaint processes are fundamental to establishing public trust in oversight. When community members can submit complaints via multiple, barrier-free channels, the oversight body receives a more comprehensive range of information regarding policing practices. This inclusivity is essential for capturing diverse experiences and for ensuring that even minor grievances are addressed.

⁶ Michael Vitoroulis, et al., *Civilian Oversight of Law Enforcement: Report on the State of the Field and Effective Oversight Practices*, U.S. Dep't of Justice, Community Oriented Policing Services (2021)



Phase 2: Effective Practices Research Summary

Many effective oversight models incorporate online submission forms, dedicated hotlines, and in-person reporting options as well as the ability for people to file complaints anonymously as many who are disproportionately policed, and therefore affected by it, fear retribution even when there are safeguards against it in place. By reducing procedural hurdles, these systems encourage greater participation from all segments of the community. Clear, accessible instructions further enhance the process, ensuring that complainants understand the information required and the subsequent steps.

Regular training for oversight staff on handling and processing complaints is also integral. Such training ensures that the intake process is consistent and that all reports are handled with fairness and objectivity. In turn, this fosters confidence among community members that their concerns are being taken seriously.

Finally, establishing protocols for tracking and publicly reporting aggregated complaint data creates a feedback loop that reinforces accountability and legitimacy. Transparent reporting of trends and resolutions further demonstrates the oversight body's commitment to continuous improvement.

2. Procedural Justice & Legitimacy

Procedural justice and legitimacy are essential to an effective oversight system, ensuring that both law enforcement and the community perceive it as fair, impartial, and efficient. Procedural justice is built on principles of transparency, neutrality, respectful treatment, and inclusive decision-making.

Research shows that when community members believe oversight mechanisms operate fairly and impartially, their trust in both the oversight body and law enforcement increases. A legitimate oversight system strengthens public cooperation with police and encourages individuals to report concerns without fear of prejudice or neglect.

When oversight bodies operate with fairness, transparency, and consistency, they gain credibility with both the public and law enforcement. Police officers are more likely to view oversight as fair and impartial when they see clearly defined procedures that apply consistent standards.

By ensuring that investigations and reviews are conducted without bias, oversight agencies help mitigate perceptions of political influence. When officers trust that disciplinary actions and policy evaluations are grounded in facts and due process rather than external pressures, they are more likely to accept the outcomes—even when the findings are unfavorable. Additionally, procedural justice in oversight reassures officers that complaints will be handled objectively, preventing unwarranted scrutiny or arbitrary disciplinary measures.



Phase 2: Effective Practices Research Summary

Transparency in oversight processes—such as clear criteria for investigations, documented findings, and open communication—fosters accountability while also affirming to officers that the agency’s work is rooted in integrity.

Key strategies to enhance procedural justice and legitimacy in Oak Park’s oversight system include:

- **Transparent Decision-Making Processes:** Ensuring that CPOC meetings, deliberations, and policy recommendations are communicated clearly to the public.
- **Consistent Application of Oversight Principles:** Avoiding perceptions of arbitrary or politically motivated oversight actions.
- **Public Education on Oversight Functions:** Informing the community about CPOC’s role, authority, and impact to foster engagement and understanding.
- **Strengthening Relationships Between Oversight Bodies and Law Enforcement:** Encouraging structured dialogue between CPOC and OPPD to promote mutual respect and accountability.

By integrating procedural justice principles into its oversight framework, Oak Park can improve trust in both the CPOC and the OPPD, ensuring that civilian oversight remains a legitimate and effective mechanism for accountability.

3. Comprehensive Access to Information

For any oversight body to perform its duties effectively, it must have full access to all relevant information in a timely manner, unfettered to the extent allowable by state statute. This includes unredacted records, investigative reports, body-worn camera footage, and internal communications. Access to comprehensive data allows oversight agencies to conduct thorough and objective reviews of police conduct.

Jurisdictions with robust oversight frameworks have clearly defined legislative and procedural mandates that require law enforcement agencies to provide complete documentation within specified timeframes. The designation of a dedicated liaison within the police department has proven effective in ensuring the timely transfer of information.

Access to detailed records also enables oversight bodies to identify systemic issues. When raw data is available, patterns in complaint trends and disciplinary actions can be analyzed, informing broader policy recommendations and systemic reforms that benefit both law enforcement and the broader community.

Empowering oversight bodies with the ability to perform independent audits and investigations further strengthens accountability. This dual review process ensures that oversight findings are well-substantiated and that any discrepancies in internal investigations are duly examined.



4. Structured Stakeholder Engagement and Public Reporting

Effective oversight relies heavily on meaningful engagement with the community. Structured stakeholder engagement ensures that the oversight process remains responsive to community needs and expectations. Regular public meetings, surveys, and focus groups are vital components of this engagement.

By holding open meetings and issuing detailed public reports, oversight agencies demonstrate transparency and foster a culture of accountability. These public disclosures typically include summaries of investigations, statistical trends, and updates on policy recommendations.

Interactive engagement mechanisms—such as facilitated forums and community advisory sessions—provide opportunities for citizens to directly influence oversight processes. This ongoing dialogue not only builds trust but also ensures that the oversight body is attuned to emerging community concerns.

A continuous feedback loop is established when oversight agencies integrate stakeholder input into their decision-making processes. This adaptive approach allows for timely adjustments to procedures, ensuring that the oversight framework remains relevant and effective.

5. Adequate Resource Allocation and Capacity Building

The effectiveness of any oversight model is directly linked to the availability of adequate resources. Dedicated budgets and staffing are essential to manage the workload and to support comprehensive investigations. Jurisdictions that invest in oversight capacity typically report more timely and thorough case reviews.

Capacity building involves both financial and human resource investments. Regular training programs ensure that oversight staff remain current on legal standards, investigative methodologies, and ethical practices. Such ongoing professional development is critical in adapting to the evolving landscape of police oversight.

In addition, establishing stable, sustainable infrastructures—such as dedicated office space, efficient case management systems, and administrative support—further enhances operational effectiveness. These resources enable oversight bodies to handle varying volumes of cases and perform in-depth data analysis.

The commitment to appropriate resource allocation sends a strong message to both the community and law enforcement that oversight is a priority. This, in turn, fosters an environment where oversight recommendations are more likely to be implemented and where accountability is continuously strengthened.



6. Clearly Defined and Adequate Jurisdiction and Authority

The success of an oversight agency depends on its clearly defined jurisdiction and authority. While expectations for civilian oversight vary, an agency must have sufficient power to fulfill its mission and effectively address community concerns. Without a well-established scope of authority, confusion and differing interpretations can weaken the agency's ability to operate.

Different oversight models require varying degrees of authority to perform their roles effectively. Investigation-focused models, for instance, must have the power to interview all relevant witnesses, including officers, and access necessary evidence and documents. Review-focused models need mechanisms to address deficiencies and ensure that law enforcement leadership is held accountable for concerns raised. Auditor/monitor-focused models must have broad access to law enforcement records, data, and personnel, along with the ability to drive meaningful change through comprehensive reporting and cooperation.

There is no universal oversight model that fits all contexts, but stakeholders must ensure that an agency's authority aligns with its responsibilities. Oak Park must clearly define the CPOC's authority concerning its fundamental duties and determine its jurisdiction beyond traditional oversight functions, if any. This may include handling complaints from within the police department, evaluating department policies and procedures, assessing officer-involved shootings and serious use of force incidents, and addressing emerging areas of interest. Once these decisions are made, enabling legislation must clearly define the agency's jurisdiction in precise terms, leaving little to no room for misinterpretation. While ensuring compliance with federal, state, and local laws, the language should also provide the agency with operational flexibility to adapt to emerging issues. By establishing strong, well-defined authority, oversight agencies can effectively fulfill their mission, build public trust, and hold law enforcement accountable.

7. Evaluation and Continuous Improvement

Ongoing evaluation is essential to ensure that oversight practices remain effective over time and are responsive to community needs. Periodic internal and external evaluations provide critical insights into the performance of oversight agencies and highlight areas for improvement.

Effective oversight programs employ a variety of evaluation methods including stakeholder surveys, performance audits, and public reporting of key metrics. Programs should elicit feedback from all stakeholder groups including police, government, community groups, and impacted individuals. These evaluations help to track progress, identify gaps, and measure the impact of implemented recommendations.

By systematically analyzing complaint processing times, investigation outcomes, and public feedback, oversight agencies can adjust their practices in response to emerging challenges.



Phase 2: Effective Practices Research Summary

This evidence-based approach to continuous improvement ensures that the oversight framework remains dynamic and effective.

Regular training and professional development are integral to this process, as they help oversight staff stay informed about new methodologies and evolving best practices. Continuous improvement is further supported when oversight agencies incorporate lessons learned from both successful and less effective practices.

Ultimately, periodic evaluation creates a cycle of feedback and refinement that bolsters the overall legitimacy and effectiveness of the oversight process, ensuring that it continues to meet the needs of the community.

B. Conclusion

This research demonstrates that while no single oversight model is universally applicable, a focus on effective practices—grounded in transparency, comprehensive information access, structured stakeholder engagement, sufficient resources, robust safeguards, formal accountability, and ongoing evaluation—can significantly enhance civilian oversight in Oak Park. Our findings provide a detailed foundation for revising the current CPOC framework to better serve the Village’s evolving needs and to strengthen public trust in policing.

While the thirteen foundational principles established by NACOLE provide a comprehensive framework for effective oversight, not all principles are equally relevant to Oak Park’s current needs. Based on our benchmarking research and local assessments, this report prioritizes key effective principles and practices that align with the Village’s oversight goals, structural limitations, and stakeholder concerns.

There are many other remaining NACOLE effective principles and practices—independence, access to law enforcement executives and staff, full cooperation, public reporting and transparency, policy and patterns in practice analysis, community outreach, community involvement, and confidentiality, anonymity, and robust safeguards against retaliation—while important in many contexts, are either already addressed in Oak Park’s existing oversight structure or are not pressing priorities for the community at this time. For instance, independence is often a challenge for newly established oversight bodies, whereas Oak Park’s CPOC has a long-established role within the Village’s governance structure.

By focusing on the effective practices that are most relevant to Oak Park’s current oversight landscape, this report aims to provide a basis for consultation and collaboration in Phase 3 of this project that will meaningfully enhance transparency, accountability, and community trust in police oversight. As Oak Park looks toward reforming its oversight structure for 2025 and beyond, these evidence-based insights and recommendations offer a practical, context-specific roadmap for creating a more effective and responsive oversight system.

Appendix A: Oversight Agencies Functions and Duties Comparison According to Model





























































Agency Name	Citizens Police Oversight Committee	Police Commission	Police Review & Advisory Board	Citizen Review Board	Citizen Review Subcommittee	Independent Police Oversight Commission	Citizen Police Review Commission	Citizens' Police Complaint Board	Citizens' Police Complaint Office
City	Oak Park, IL	Burlington, VT	Cambridge, MA	Cedar Rapids, IA	Champaign, IL	East Lansing, MI	Evanston, IL	Indianapolis, IN	
Model of Oversight	Review System	Review System	Review System	Review System	Review System	Review System	Review System	Review System	
Structure:									
Independent from Administration/Elected Officials Advisory	x		x			x			
Size	7 members	7 members	5 members	9 members	5 members	11 members	9 members	9 voting / 3 non-voting police	
Member Qualifications		x	x	x	x	x			
Conflict of Interest and Avoiding Bias				?			x		
Stipends									
Board Training Requirement			x	x	x		x	x	
Reports To	City Council	Mayor/City Council	City Manager	City Council	Human Relations Commission		Human Services Committee		Mayor
Oversight Functions:									
Commendation Program									
Complaints									
Initiate Complaints						x			
Monitor Complaint Investigations									
Oversee a Monitoring System for Tracking Complaints				x					
Receive Complaints		x	x	x		x			x
Interaction with Complainants								x	
Investigation Review									
Reviews Internally Generated Complaints		x			x			x	
Reviews Externally Generated Complaints	x	x	x	x	x	x	x	x	
Reviews Investigation Prior to Discipline		Unclear	x	x	x	x	x	x	
Request Additional Information		x	x						
May Request Chief Reconsider Action	x	x							
Complaint Disposition		x		x				x	
Assess Accused Officer Conduct									
Request Review of Completed Action Taken by Police									
Request Review of Completed Action Taken by Staff									
Appeal Complaints			x						
Conduct Hearings		x	x					x	
Alternate			x			x			x
Other Policing Areas of Jurisdiction/Interest									
Racial Disparity	x	x		x					
Use of Force						x			
Traffic Stops	x			x					
Arrests	x			x					
Resisting and Obstructing						x			
Disorderly Conduct						x			
Police Response to Mental/Behavioral Health Crisis									
Encounters with People Experiencing Homelessness						x			
Availability of Unarmed Emergency Response Services						x			
Identify and Analyze Trends/Data	x			x		x			
Access to Scene of Critical Incidents									
Hiring, Training, and Promotions	x			x		x			
Biased Based Policing	x								
911 Dispatch System						x			
Early Intervention System						x			
Brady Lists						x			
Monitor Police Audits									
Monitor Compliance with Recommendations									
Pattern and Practice Analysis									
Findings and Recommendations									
Makes Findings			x	x	x			x	
Approve Staff Findings									
Makes Recommendations				x	x	x		x	
Approve Staff Recommendations									
Makes Disciplinary Recommendations/Determinations		x	x	x					
Consultants/Contractors/Outside Entity		x	x	x		x			x
Stakeholder Engagement				x					
Community Liaisons									
Community Forums				x		x			
Solicit Input									
Educate the Community					x	x			
Special Hearings		x				x			
Meeting with Marginalized Groups									
Independent Investigation									
Chief or Command Staff						x			
At the Request of Elected Officials or the Public									
Allegations of Complaint				x		x			x
Refer to Outside Agency									x
Run a Concurrent Investigation									
Critical Incidents									
Policy Review									
Authority to Change Policies / Procedures		x							
Policy / Procedure Recommendations				x		x			
Monitor Policy Compliance									
Reporting									
Receives Reports from Police		x	x	x		x			
Makes Reports to Police	x				x		x		x
Receives Reports from Staff									
May Make Recommendation Related to Investigation		x			x				
Annual/Semi-Annual/Monthly Report				x	x				x
Special Reports									
Police Attendance Requirement at Meetings					x				
Other Policing Functions									
Manages the Police Department		x							
Police Budget Consultation			x						
Police Chief Hiring Criteria									
Participates in Police Chief Hiring/Reappointment		x		x					
Annual Review of the Chief				x					
Access									
Reviews Selected Materials from Police Investigation	x			x					
Reviews All Materials from Police Investigation			x		x		x		
Access to Records		x			x				
Subpoena Power			x		x				x
Maintain Confidentiality					x	x		x	
Disputes to Access are Settled					x	x			

Agency Name	Citizens Police Oversight Committee	Police Civilian Oversight Board	Independent Police Monitor	Independent Police Auditor	Community Police Oversight Commission	Independent Police Monitor	Independent Police Auditor
City	Oak Park, IL	Madison, WI		Palo Alto, CA	Pasadena, CA		Santa Rosa, CA
Model of Oversight	Review System	Auditor	Auditor	Auditor	Auditor		Auditor
Structure:							
Independent from Administration/Elected Officials			x			x	
Advisory	x						
Size	7 members	11 members / 2 alternates			11 members	2 total	
Member Qualifications					x		
Conflict of Interest and Avoiding Bias							
Stipends		x					
Board Training Requirement		x			x		
Reports To	City Council		Board			City Attorney	City Manager
Oversight Functions:							
Commendation Program							
Complaints							
Initiate Complaints							
Monitor Complaint Investigations			x		x		x
Oversee a Monitoring System for Tracking Complaints							
Receive Complaints				x			x
Interaction with Complainants							x
Investigation Review				x			x
Reviews Internally Generated Complaints			x				x
Reviews Externally Generated Complaints	x		x	x			x
Reviews Investigation Prior to Discipline			x		x		x
Request Additional Information			x				
May Request Chief Reconsider Action	x						
Complaint Disposition							x
Assess Accused Officer Conduct							
Request Review of Completed Action Taken by Police							
Request Review of Completed Action Taken by Staff							
Appeal Complaints							
Conduct Hearings							
Alternate							
Other Policing Areas of Jurisdiction/Interest							
Racial Disparity	x			x			x
Use of Force			x	x	x	x	x
Traffic Stops	x			x			x
Arrests	x			x			
Resisting and Obstructing							
Disorderly Conduct							
Police Response to Mental/Behavioral Health Crisis							
Encounters with People Experiencing Homelessness							
Availability of Unarmed Emergency Response Services							
Identify and Analyze Trends/Data	x		x	x	x		
Access to Scene of Critical Incidents							
Hiring, Training, and Promotions	x	x			x		x
Biased Based Policing	x			x		x	x
911 Dispatch System							
Early Intervention System							
Brady Lists							
Monitor Police Audits			x				
Monitor Compliance with Recommendations			x				
Pattern and Practice Analysis			x				
Findings and Recommendations							
Makes Findings				x			
Approve Staff Findings							
Makes Recommendations		x	x	x	x	x	x
Approve Staff Recommendations							
Makes Disciplinary Recommendations/Determinations			x				
Consultants/Contractors/Outside Entity							
			x				
Stakeholder Engagement							
							x
Community Liaisons							
Community Forums							
Solicit Input		x					
Educate the Community		x					
Special Hearings		x					
Meeting with Marginalized Groups		x					
Independent Investigation							
Chief or Command Staff			x				
At the Request of Elected Officials or the Public							
Allegations of Complaint			x				
Refer to Outside Agency							
Run a Concurrent Investigation							
Critical Incidents							
Policy Review							
Authority to Change Policies / Procedures			x	x	x		x
Policy / Procedure Recommendations			x				
Monitor Policy Compliance							
Reporting							
Receives Reports from Police							
Makes Reports to Police	x						
Receives Reports from Staff					x		
May Make Recommendation Related to Investigation			x				
Annual/Semi-Annual/Monthly Report		x	x	x			x
Special Reports			x	x	x	x	x
Police Attendance Requirement at Meetings							
Other Policing Functions							
Manages the Police Department							
Police Budget Consultation							
Police Chief Hiring Criteria							
Participates in Police Chief Hiring/Reappointment							
Annual Review of the Chief		x					
Access							
Reviews Selected Materials from Police Investigation	x						
Reviews All Materials from Police Investigation						x	
Access to Records		x					x
Subpoena Power		x			x		
Maintain Confidentiality			x		x	x	
Disputes to Access are Settled						x	




Agency Name	Citizens Police Oversight Committee	Police Accountability Board	Office of the Director of Accountability
City	Oak Park, IL	Berkeley, CA	
Model of Oversight	Review System	Hybrid	
Structure:			
Independent from Administration/Elected Officials		x	x
Advisory	x		
Size	7 members	9 members	
Member Qualifications		x	
Conflict of Interest and Avoiding Bias		x	
Stipends		x	
Board Training Requirement		x	x
Reports To	City Council	City Council	Police Accountability Board
Oversight Functions:			
Commendation Program		x	
Complaints			
Initiate Complaints			
Monitor Complaint Investigations			
Oversee a Monitoring System for Tracking Complaints			
Receive Complaints		x	x
Interaction with Complainants			
Investigation Review			
Reviews Internally Generated Complaints			
Reviews Externally Generated Complaints	x		
Reviews Investigation Prior to Discipline			x
Request Additional Information			
May Request Chief Reconsider Action	x		
Complaint Disposition			
Assess Accused Officer Conduct			x
Request Review of Completed Action Taken by Police			
Request Review of Completed Action Taken by Staff			
Appeal Complaints			x
Conduct Hearings		x	
Alternate			x
Other Policing Areas of Jurisdiction/Interest			
Racial Disparity	x		
Use of Force			
Traffic Stops	x		
Arrests	x		
Resisting and Obstructing			
Disorderly Conduct			
Police Response to Mental/Behavioral Health Crisis			
Encounters with People Experiencing Homelessness			
Availability of Unarmed Emergency Response Services			
Identify and Analyze Trends/Data	x		
Access to Scene of Critical Incidents			
Hiring, Training, and Promotions	x		
Biased Based Policing	x		
911 Dispatch System			
Early Intervention System			
Brady Lists			
Monitor Police Audits			
Monitor Compliance with Recommendations			
Pattern and Practice Analysis			
Findings and Recommendations			
Makes Findings		Board makes final to Chief	x
Approve Staff Findings		x	
Makes Recommendations		Board makes final to Chief	x
Approve Staff Recommendations		x	
Makes Disciplinary Recommendations/Determinations		x	
Consultants/Contractors/Outside Entity			x
Stakeholder Engagement			x
Community Liaisons			
Community Forums			
Solicit Input			
Educate the Community			
Special Hearings			
Meeting with Marginalized Groups			
Independent Investigation		x	
Chief or Command Staff			
At the Request of Elected Officials or the Public			
Allegations of Complaint			
Refer to Outside Agency			
Run a Concurrent Investigation			
Critical Incidents			
Policy Review		x	
Authority to Change Policies / Procedures			
Policy / Procedure Recommendations		x	
Monitor Policy Compliance			
Reporting			
Receives Reports from Police		x	
Makes Reports to Police	x		
Receives Reports from Staff			
May Make Recommendation Related to Investigation			
Annual/Semi-Annual/Monthly Report		Approves staff and presents to elected	x
Special Reports			
Police Attendance Requirement at Meetings		x	
Other Policing Functions			
Manages the Police Department			
Police Budget Consultation			
Police Chief Hiring Criteria		x	
Participates in Police Chief Hiring/Reappointment		x	
Annual Review of the Chief			
Access		x	
Reviews Selected Materials from Police Investigation	x		
Reviews All Materials from Police Investigation			
Access to Records			
Subpoena Power		x	
Maintain Confidentiality		x	
Disputes to Access are Settled		x	x

Appendix B: Oversight Heatmap Comparison Table

This heatmap highlights the relative strengths and gaps in civilian oversight structures across these peer communities, helping inform potential enhancements to Oak Park's CPOC model based on evidence-based practices.

City	Size Match	Investigative Authority	Subpoena Power	Policy Influence	Transparency Tools
Burlington, VT	 High	 Low	 None	 Medium	 High
Cedar Rapids, IA	 Medium	 Low	 None	 Medium	 Medium
East Lansing, MI	 High	 Low	 None	 Medium	 High
Evanston, IL	 High	 Low	 None	 Medium	 Medium
Indianapolis, IN	 Medium	 Medium	 Yes	 Medium	 Medium
Madison, WI	 Medium	 Low	 Yes	 Medium	 Medium
Palo Alto, CA	 Medium	 Low	 None	 Medium	 Medium
Pasadena, CA	 Medium	 Low	 Yes	 Medium	 High
Santa Rosa, CA	 Medium	 Low	 None	 Medium	 Medium
Berkeley, CA	 High	 High	 Yes	 High	 High
Champaign, IL	 Medium	 Low	 Yes	 Medium	 Medium
Cambridge, MA	 High	 High	 Yes	 High	 High

Legend

-  **High** = Strong Implementation
-  **Medium** = Partial or Developing Implementation
-  **Low / None** = Limited or Absent

Criteria Summary

- Size Match:** Based on population ranges to match Oak Park's size and governance structure.
- Investigative Authority:** Measures whether the oversight body has full investigative authority (high), limited audit/review roles (medium), or none (low).
- Subpoena Power:** Evaluates whether the oversight body has the legal authority to issue subpoenas (high), limited or indirect subpoena power (medium), or none (low).
- Policy Influence:** Examines whether the oversight body can issue binding or formal recommendations (high), suggest non-binding changes (medium), or has little to no policy involvement (low).
- Transparency Tools:** Assesses the extent of transparency practices, such as public reports, dashboards, and accessible data.

Appendix C: City Oversight Summary Table

This comparative analysis provides a foundation for adapting effective oversight practices to Oak Park's unique context, enabling the CPOC to build greater transparency, accountability, and public trust.

City	Key Strengths	Key Challenges
Burlington, VT	<ul style="list-style-type: none"> ✓ Policy feedback mechanisms ✓ Community centered review structure 	<ul style="list-style-type: none"> ✗ Small scale and staffing ✗ Lacks legal authority
Cambridge, MA	<ul style="list-style-type: none"> ✓ Provides impartial investigations of complaints 	<ul style="list-style-type: none"> ✗ Under-resourced and lacks independent investigative staff
Cedar Rapids, IA	<ul style="list-style-type: none"> ✓ Data analysis focus ✓ NACOLE training for board members 	<ul style="list-style-type: none"> ✗ Limited investigative authority
Champaign, IL	<ul style="list-style-type: none"> ✓ Detailed complaint review evaluation process 	<ul style="list-style-type: none"> ✗ Limited authority and effectiveness in addressing police misconduct
East Lansing, MI	<ul style="list-style-type: none"> ✓ Focus on accountability, racial equity, and transparency ✓ Access to internal data 	<ul style="list-style-type: none"> ✗ New agency still building processes and community trust ✗ Limited staff capacity
Evanston, IL	<ul style="list-style-type: none"> ✓ Emphasizes community diversity and independent complaint review 	<ul style="list-style-type: none"> ✗ No investigatory authority ✗ Dependent on police department cooperation
Indianapolis, IN	<ul style="list-style-type: none"> ✓ Complaint intake and independent investigations ✓ Concurrent review process 	<ul style="list-style-type: none"> ✗ Small staff ✗ Requires further development to review outcomes
Madison, WI	<ul style="list-style-type: none"> ✓ Dedicated monitor role ✓ Data auditing capabilities ✓ Supports civilian board 	<ul style="list-style-type: none"> ✗ Limited investigatory power ✗ Performance metrics still developing
Palo Alto, CA	<ul style="list-style-type: none"> ✓ Transparent audits of complaints and broader oversight scope ✓ Use of force reviews and audits 	<ul style="list-style-type: none"> ✗ Minimal investigative capacity
Pasadena, CA	<ul style="list-style-type: none"> ✓ Comprehensive complaint review by external auditor 	<ul style="list-style-type: none"> ✗ Inadequate complainant communication and engagement ✗ No investigative authority
Santa Rosa, CA	<ul style="list-style-type: none"> ✓ External reviews identify policy gaps ✓ Investigates excessive force complaints ✓ Annual policy and training audits 	<ul style="list-style-type: none"> ✗ Limited subpoena power
Berkeley, CA	<ul style="list-style-type: none"> ✓ Independent investigative authority ✓ High transparency 	<ul style="list-style-type: none"> ✗ Requires sustained political support ✗ Resource intensive

Appendix D: Oversight Agencies Ordinances/Policies

BURLINGTON POLICE COMMISSION POLICY
Role of the Burlington Police Commission in Reviewing Complaints Against BPD
Employees
Adopted August 25, 2020

Purpose: The purpose of this policy is to support principles of fair and impartial policing within the City of Burlington Police Department by adopting a procedure that defines the role of the Burlington Police Commission in reviewing complaints against agency members.

Policy:

1. When a complaint is received by the Burlington Police Department about the conduct of an employee of the Burlington Police Department, the Chief of Police shall cause that complaint to be investigated as soon as practical by an individual or individuals with no interest in or attachment to the issue or officer(s) being investigated. When a complaint is received by members of the Burlington Police Commission, the member of the Burlington Police Commission should encourage the person making the complaint to submit it via the Burlington City website or should personally take the complaint, attempting to capture all the information otherwise contained in the Citizen's Complaint Form. [See Appendix A]
 - a. All complaints, whether generated externally or internally, are referred to as Citizen's Complaints.
 - b. All Citizen's Complaints are documented on a spreadsheet maintained by the Deputy Chief of Administration, or designee.
 - c. Lower-level and some mid-level complaints that are able to be resolved quickly and at first level of supervision, remain as Citizen's Complaints.
 - d. Some mid-level complaints may be escalated to an Administrative Review (AR). An AR is designed to determine if a complaint needs to be elevated to a Bureau of Internal Affairs investigation or if it is able to be handled without a robust personnel investigation.
 - e. Higher-level complaints will either be an Administrative Review or will be escalated to a Bureau of Internal Affairs investigation.
 - f. Lower-level, mid-level, and higher-level complaints will be categorized consistent with the Burlington Police Officers' Association Contract, Article XV, section 15.2. [See Appendix B]
2. The Deputy Chief of Administration, or his/her designee, will maintain a written record of each complaint. That written record will at a minimum include:
 - The name(s) of the employee(s) involved.
 - The date of receipt of the allegation.
 - The date of the alleged incident, if known.
 - The type or nature of the allegation.

- The name(s) of the person(s) who investigated.
- The final disposition of each complaint.
- How the matter was closed out with the complainant.

In addition, if the complaint involves an allegation of excessive use of force, or an allegation of dishonesty or other serious misconduct, the written record will include:

- All action taken in response to the complaint.
 - Identification of all witnesses, documents, evidence, or other information obtained or consulted in the course of the investigation.
3. The written record of each complaint will be considered confidential. Each Commissioner shall have access to the written records of all complaints upon request to the Chief, subject to the Vermont Public Records Act, and the Burlington Police Officers' Association agreement. Further information may be available to the Commissioner receiving the records upon the completion of a fingerprint-supported background check and the execution of a confidentiality agreement.
 4. The Chief will report to the Police Commission on all complaints against members of the department as follows:
 - Updates about complaints against employees will be shared with the Commission in Executive Session at the first meeting following receipt of the complaint, unless the matter is of such urgency that a special meeting is required. Status updates on the progress of complaints under investigation will be provided to the Commission, as appropriate, and further detail and access to reports/video/etc shall be provided to the Police Commission in Executive Session at the first meeting after the investigation has been completed.
 - For lower- and mid-level complaints, the Chief will provide a verbal or written summary of the complaints and their status or disposition in Executive Session.
 - For higher-level complaints, such as those involving an allegation of excessive use of force, dishonesty, discrimination, harassment, or other serious misconduct; or for any lower- or mid-level complaint that results in discipline beyond a written reprimand; or for any other conduct for which suspension or termination is recommended, the Chief will provide the Police Commission with a full verbal briefing of the allegations and the recommended disposition of the case in executive session.
 - The Chief of Police, or his/her designee, will report to the Police Commission in Executive Session on a monthly basis regarding any Use-of-Force incidents. The update shall include demographic data about the officer(s) and subject(s) such as gender, age, and race, and also provide a description of incident.

- At the request of any member of the Police Commission, the Chief will make the written record available for Executive Session review by the Police Commission, as well as any audio or video footage, written materials, evidence, or other information related to the allegation.
 - The Chief of Police, in consultation with the States Attorney's Office, will make the determination of if a complaint needs to be referred outside the Department for investigation of possible criminal conduct. If the complaint has been referred outside of the Department for investigation of possible criminal conduct, the materials will be made available to the Police Commission in Executive Session once a determination has been made that the materials may be disclosed to the Police Commission without adversely affecting any possible prosecution.
5. After receipt of the report described above, the Police Commission may:
- accept the Chief's report and recommended action in full or in part;
 - request additional information;
 - request that the Chief reconsider the action and/or make a recommendation to the Chief about the investigation, process, disposition (including recommending a range of sanctions for the misconduct), or other aspect of the matter, or
 - postpone action to a later date, but no later than 14 days from the date of initial receipt of the report.
6. The Chief may accept or reject the Police Commission's recommendations. If the Chief rejects the Police Commission's recommendations, the Chief shall explain to the Police Commission why the recommendations were not accepted. If a majority of the Police Commission disagrees with the Chief's decision, the Police Commission Chair shall report this to the Mayor. Police Commission members should take care to avoid unauthorized disclosure of confidential information. To that end, any Commissioner may consult with the City Attorney's Office to obtain advice related to, among other things, the use and disclosure of confidential information.
7. The Chief of Police is responsible for reporting any misconduct of Burlington Police Department employees that falls under 20 VSA 2401 to the Vermont Criminal Justice Training Council.
8. Whenever the Police Commission becomes aware of allegations of misconduct by the Chief of Police, or if the Police Commission has concerns about the performance of the Chief of Police, the Police Commission Chair shall report this to the Mayor in a timely manner. In the event that the Chief of Police has engaged in misconduct pursuant to 20 VSA 2401, the

Police Commission Chair shall report this to the Chair of the Vermont Criminal Justice Training Council.

9. The Police Commission shall report to the Burlington City Council twice each year regarding this policy. The report shall include a redacted summary of the number, type, and disposition of complaints reported to the Police Commission.

|

Chapter 2.74 - POLICE REVIEW AND ADVISORY BOARD

Sections:

[2.74.010 - Purpose.](#)

[2.74.020 - Established—Composition.](#)

[2.74.030 - Officers and staff.](#)

[2.74.040 - Duties.](#)

[2.74.050 - Chief of Police—Duties.](#)

[2.74.060 - Special meetings.](#)

[2.74.070 - Discipline.](#)

[2.74.080 - Complaints.](#)

[2.74.090 - Resolution of complaints.](#)

[2.74.100 - Hiring and promotions.](#)

[2.74.110 - Hearing by petition.](#)

2.74.010 - Purpose.

- A. The general purpose of this chapter is to provide for citizen participation in reviewing Police Department policies, practices and procedures and to provide a prompt, impartial and fair investigation of complaints brought by individuals, police officers upon whom a complaint has been brought and employees of the Police Department.
- B. The City Manager shall make every effort to insure that individuals appointed to the Board, fairly and accurately represent the City's racial, social and economic composition.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 1)

(Ord. 1268, Amended, 09/29/2003)

2.74.020 - Established—Composition.

- A. There shall be a five-member City of Cambridge Police Review and Advisory Board (the "Board"). Members of the Board shall be appointed by the City Manager. Prior to appointing any member to the Board, the City Manager shall seek qualified candidates by advertising in the local newspapers for individuals who desire appointment to the Board. The term of membership on the Board is five years. No person may serve more than two consecutive terms as a member of the Board. The City Manager may remove members of the Board only for cause as defined in the City Charter. All members of the Board shall be residents of the City at the time of appointment. If a Board member ceases to be a resident of the city, he/she shall remain on the Board until the City Manager appoints a suitable candidate to fill the position.
- B. The members of the Board shall not hold any other position for the city while he or she is a member of the Board.

- C. No member of a City employee's immediate family (husband, wife, brother, sister, son or daughter) shall be appointed to, or hired by the Board.
- D. No member of the Board shall have been an employee of the City within two years of his or her appointment to the Board, and no member of such person's immediate family shall be appointed to, or hired by the Board.
- E. The Board shall elect a Chairperson annually. The Board shall meet at the call of its Chairperson, but shall meet at least once a month. Meetings of the Board shall be open to the public except when the Board, in its discretion, meets in executive session in private. All meetings of the Board shall be conducted in accordance with the open meeting laws of the Commonwealth.
- F. Members of the Board shall not receive compensation for services but shall receive reasonable expenses and fees incurred as a result of their membership on the Board.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 2)

(Ord. 1284, Amended, 04/11/2005)

2.74.030 - Officers and staff.

- A. Executive Secretary to the Board. The Board shall appoint an Executive Secretary. The Executive Secretary shall be responsible for the daily administration of the Board. The Executive Secretary's terms and conditions of employment shall be fixed by the Board. The Executive Secretary to the Board shall, with the consent and approval of the Board, be empowered to hire clerical help when needed.
- B. Investigative Staff.
 - 1. The Board shall also appoint a Board Investigator if it deems necessary and such additional staff of investigators as it deems necessary. The terms and conditions of employment for such Board Investigator shall be fixed by the Board, but the salary of the Board Investigator shall be equivalent to that received by investigators of similar Boards of Investigation.
 - 2. The terms and conditions of employment for all other investigative staff shall be fixed by the Board. All Board investigators must possess skills and experience necessary for investigative work.
- C. Other Staff. The Board, from time to time, may contract, in accordance with existing regulations and law, for such additional staff as is necessary to carry out its duties.
- D. All members of the staff are under the direction of the Board.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 4)

(Ord. 1284, Amended, 04/11/2005)

2.74.040 - Duties.

The Board shall have the following duties:

- A. The Chief of Police in consultation with the Board, shall establish policies, rules and regulations for the Police Department (the "Department");
- B. The Board and the City Council shall review the Department budget before it is submitted to the City Manager;
- C. The Board shall receive and resolve, as provided in Sections [2.74.080](#) and [2.74.090](#) of this chapter, any complaint concerning the operation of the Department;

- D. The Board shall make recommendations to the Chief of Police and/or the City Manager in matters concerning the discipline of employees of the Department;
- E. The Board shall make quarterly reports to the City Manager, the Mayor, City Council and to the public, of the Department's activities during the previous year, including the handling of complaints, and of future plans. The final disposition of complaints shall be made public;
- F. The Board, with the assistance and approval of the City Solicitor, shall have the power to subpoena witnesses, administer oaths, take testimony and require the production of evidence. The Board, through the office of the City Solicitor, shall apply to the appropriate court to enforce a subpoena or order for production of evidence or to impose any penalty prescribed for failure to obey a subpoena or order. The Board may delegate in writing to a member of its staff the powers to administer oaths and take testimony. A delegation is revocable at the will of the Board and does not prevent exercise of any power by the Board.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 3)

2.74.050 - Chief of Police—Duties.

The Chief of Police shall administer the Department pursuant to existing laws, and the rules and regulations of the Department and the State civil service rules and regulations.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 5)

2.74.060 - Special meetings.

Special meetings may be called by the Executive Secretary or by three members of the Board, upon personal notice being given to all members of the Board, or written notice being mailed to each member and received at least forty-eight hours prior to such meeting, unless such notice is waived by such members.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 10)

2.74.070 - Discipline.

- A. Manual. The Chief of Police, in consultation with the Board, shall adopt a manual of rules, regulations and procedures for the Department. The manual shall defined categories of major and minor offenses and shall set forth the maximum and minimum penalties for each offense. The offenses and penalties shall not be defined in a manner that is inconsistent with existing civil service laws.
- B. Summary Discipline. The Chief of Police may implement summary discipline for a minor offense.
- C. General Discipline. The Chief of Police shall recommend to the City Manager the discharge or indefinite suspension of any employee of the Department for a major offense.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 6)

2.74.080 - Complaints.

- A. A complaint by a member of the public, hereinafter referred to as "a civilian complaint," or any police officer or civilian employee concerning the Department may be filed either with the Department or the Board. Complaints concerning the Department and filed with the Department shall be forwarded immediately to the Board Secretary. Copies of the complaint shall be made available to each member of the Board, the Board Investigator and the Chief of Police. The Chief of Police shall

investigate such a complaint immediately and file a report of findings with the Board within thirty days. Complaints concerning the Department and filed with the Board shall be investigated immediately by the Board. Copies of the complaint shall be made available to the Chief of Police. The Board shall immediately order a preliminary investigation by its investigative staff. The purpose of such preliminary investigation shall be to determine if there is sufficient evidence to warrant a full investigation of the allegations contained within the complaint by the Board. The preliminary investigation shall be completed within ten days, unless for cause a member of the Board extends such time. No preliminary investigation shall be extended for more than thirty days. After completion of such preliminary investigation, the Board shall either order a full investigation if sufficient evidence exists to warrant same or if sufficient evidence does not exist to warrant same, summarily dismiss the complaint.

- B. In addition to the above, the Board may also cause to be investigated any complaint concerning the Department or its rules and regulations.
- C. The Board Secretary shall keep a public docket of complaints and the disposition of each complaint after investigation.
- D. The Board shall issue a written response to all complaints and it shall deliver a copy of its response and/or findings to all parties.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 7)

2.74.090 - Resolution of complaints.

- A. If a complaint is not resolved as a result of investigation to the satisfaction of the complainant, the respondent employee, or a member of the Board, either the complainant, the respondent employee or the Board member may request the full Board to hear or review the matter. The Board may, as its option, when it determines that a hearing or review is warranted by the evidence, hear or review the matter itself or refer the matter to a fact finder. A representative of the City Solicitor's office shall be present at any hearing before the Board.
- B. The fact finder shall be an attorney and, in the conduct of the hearing, may with the assistance and approval of the City Solicitor, subpoena witnesses, administer oaths, take testimony and require the production of evidence. To enforce a subpoena or order for production of evidence or to impose any penalty prescribed for failure to obey a subpoena or order, the fact finder shall apply to the appropriate court. The costs of the fact finder shall be borne by the City.
- C. After a hearing, the fact finder shall, within thirty days, submit findings of fact to the Board. The Board, upon receipt of the report of the fact finder, if any, shall within thirty days recommend to the City Manager any discipline to be imposed. Any report or action involving a civilian complaint shall be made public.
- D. Any employee against whom a complaint is filed is presumed innocent and shall not forfeit any pay or seniority rights pending final action by the Board, except with the concurrence of four members of the Board. All pleadings filed and all hearings before the Board and the fact finder which involve a civilian complaint shall be public. The parties to any hearing are the complainant and the respondent employee. Each has a right to counsel. The complainant's case may be presented by the complainant or complainant's counsel. Any probative evidence may be admitted.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 8)

2.74.100 - Hiring and promotions.

- A. Entry into employment with the Department as a police officer is by appointment of the City Manager, in accordance with the rules, regulations and procedures of the Department and the Commonwealth's civil service laws.
- B. Promotions shall be made on the basis of training, experience, education and competitive examinations, all in accordance with existing law. The City Manager shall make all promotions within the Department.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 9)

2.74.110 - Hearing by petition.

On the written petition of fifty or more residents of the City, filed with the Board, the Board shall hold a special hearing for the purpose of responding to such petition. Copies of the petition shall be delivered to the City Manager, City Clerk and the City Council. Notice of such hearing shall be given in the same manner as provided for other hearings of the Board. The Board shall conduct such hearing upon the subject matter of the petition within thirty days of the filing of such petition with the Board.

(Ord. 1018 (part), 1984: prior code Ch. 15 Art. 4 § 11)

CHAPTER 74 - CITIZEN REVIEW BOARD FOR COMMUNITY LAW ENFORCEMENT

74.01 - DECLARATION OF PURPOSE AND INTENT.

- (A) The City of Cedar Rapids (hereinafter the "City") establishes the Cedar Rapids Citizen Review Board (hereinafter the "CRB") that will be sufficiently independent for the following purposes:
- (1) To ensure fair and professional law enforcement that is constitutional, effective, and responsive to the standards, values, and needs of those to be served;
 - (2) To ensure investigations into claims of inappropriate conduct by sworn police officers are conducted in a manner that is fair, thorough, and accurate;
 - (3) To provide review of police investigations into citizen complaints;
 - (4) To ensure accountability with respect to complaints of officer misconduct;
 - (5) To ensure public safety accountability, bolster confidence in police, increase and improve public cooperation, and make our community safer for everyone;
 - (6) To assist in identifying and analyzing trends in policing whose origins may be rooted in bias or other systematic phenomena, and upon discovery of these trends, to assist the City and Cedar Rapids Police Department (hereinafter referred to as the "CRPD") in developing solutions to ensure the fair and equitable treatment of citizens;
 - (7) To increase citizens' understanding of law enforcement policies, procedures, and operations through additional transparency created through the complaint and investigations review process; and
 - (8) To create an additional conduit for communication between the CRPD and the Cedar Rapids community through outreach to community and law enforcement.
- (B) In enacting this ordinance the Cedar Rapids City Council (hereinafter the "City Council") intends that:
- (1) Internal accountability within the CRPD is a valid public purpose, and the CRPD should perform its own investigations into claims of inappropriate police conduct. If a complaint is asserted against the Cedar Rapids Chief of Police (hereinafter the "Chief" or the "Police Chief"), the City Manager will investigate the claim and report to the CRB as the Chief would pursuant to this chapter, and to the City Council. An allegation of misconduct lodged against a sworn police officer (hereinafter "police officer" or "officer") employed by the CRPD, where the subject action(s) and/or behavior(s) of the complaint occurred while the officer was acting in the capacity of a sworn police officer and submitted as a written complaint signed by a complainant or a written statement by an officer receiving an oral complaint stating the complainant's allegation may hereinafter be referred to as a "complaint." Actions or behaviors not in conformance with current CRPD policies and procedures may hereinafter be referred to as "misconduct;"
 - (2) Findings of the CRB are intended to be used only as provided for in this chapter;
 - (3) The CRB may only review complaints about the conduct of police officers. The CRB is not intended to be a court of law, a tort claim process or other litigation process. No action of the CRB may be deemed to

diminish or limit the right of any person to file a claim or a lawsuit against the city;

- (4) The CRB shall not interfere with or diminish the legal rights of sworn police officers, including those rights protected under the civil service laws, or any other state or federal law. Similarly, the CRB will respect the rights of privacy and freedom from defamation shared by complainants and witnesses, as well as those same rights enjoyed by police officers under the law; and
- (5) Complaints will be investigated in a fair, thorough, and accurate manner. Investigations will follow procedures outlined in the CRPD's Department Directives, as well as applicable state and federal law.

(003-21)

74.02 - CEDAR RAPIDS CITIZEN REVIEW BOARD.

(A) The Cedar Rapids Citizen Review Board is hereby created. The Mayor shall appoint the members of the CRB, with the advice and consent of the City Council. The CRB will consist of nine (9) voting members who shall serve without compensation.

(1) Members shall be appointed in accordance with the following:

a. Membership Composition.

- i. A minimum of three (3) members will be selected from applications submitted by the general public and who are not identified on their application as affiliated with a group or service provider as provided below;
- ii. A minimum of three (3) members will be selected from applicants who identify on their application that they are employed by, or an active volunteer in a group with a designation pursuant to Iowa Code Section 501(c)(3) (2020), as amended from time to time, and that is focused on advocacy of, and racial justice for, underrepresented residents of Cedar Rapids. No more than one (1) applicant affiliated with a group may be appointed unless there are insufficient applications eligible for appointment pursuant to this paragraph. Examples of organizations carrying this designation include, but are not limited to: NAACP (National Association for the Advancement of Colored People), LULAC (League of United Latin American Citizens), Iowa Asian Alliance, ASJ (Advocates for Social Justice), and United We March Forward.
- iii. A minimum of two (2) members will be appointed by the Mayor from applicants who identify on their application that they are employed by, or are an active volunteer with a service provider that works with residents of Cedar Rapids in the areas of mental health, physical health, homelessness, food insecurity, youth advocacy, alcohol and other drug abuse, and/or similar social issues. No more than one (1) applicant affiliated with a service provider may be appointed unless there are insufficient applications eligible for appointment pursuant to this paragraph. Examples of organizations meeting this requirement include, but are not limited to: United Way, a United Way funded service provider, and NAMI (National Alliance on Mental Illness).

b. Professional Membership Composition. At least one (1) member appointed to the Board must be an attorney licensed to practice law in the state of Iowa. This member may not serve as legal counsel for

the CRB.

- c. Diversity in Composition. In appointing members to the Board, the Mayor and City Council shall ensure that members represent a diversity of age, socioeconomic status, gender, geographic residence, and work experience. The Mayor and City Council shall further strive to include members from a diverse background, including but not limited to:
 - i. Persons who are African American, Arab, Asian, Black, Hispanic, Native American/Indigenous, Native Hawaiian/Pacific Islander and/or from the LGBTQ+ or disability community.
 - ii. Persons with lived experience with homelessness, mental health, and/or substance abuse.
 - iii. Persons with an arrest/conviction record.
 - (2) In addition to the composition standards set forth above, the following are the minimum qualifications for voting members of the CRB:
 - a. Are not currently employed by the City of Cedar Rapids;
 - b. Are not currently, and have not been, employed as a sworn law enforcement officer or employed as an unsworn employee of law enforcement for a period of four (4) years prior to appointment;
 - c. Are not currently, and have not been, an elected official for a period of four (4) years prior to appointment;
 - d. Do not have a personal history of making multiple unfounded formal complaints against the CRPD;
 - e. Have demonstrated a strong commitment to transparency and impartial decision-making;
 - f. Have demonstrated the ability to maintain confidentiality of sensitive information; and
 - g. Must be Cedar Rapids residents at the time of appointment and during the term of appointment.
 - (3) The term of office of each member of the CRB will be 3 years. A member chosen to fill a vacancy otherwise than by expiration of a term will be appointed for the unexpired term of the member whom the new member is to succeed. A member is eligible for reappointment, but may not serve more than 2 consecutive 3-year terms. Members who miss 3 consecutive meetings or 4 meetings within 12 months will be considered to have resigned and a vacancy created. The terms of the first set of members will be staggered as follows:
 - a. Three (3) members serving one (1) year terms;
 - b. Three (3) members serving two (2) year terms; and
 - c. Three (3) members serving three (3) year terms
 - (4) If a member is unable to complete that member's term for any reason, or is unable to complete the required training outlined in subsection (B) below, the Mayor shall appoint, with input from and the approval of the City Council, a new member to complete the term. Such new member may then be eligible to be reappointed for no more than one (1) additional full consecutive term, if the member has served eighteen (18) months or more of the original term, and no more than two (2) additional full consecutive terms, if the member has served less than eighteen (18) months of the original term.
- (B) As a requirement for service, before they may be eligible for appointment, voting members of the CRB must

agree to complete the following training:

- (1) Complete a training course that is a minimum of, but not limited to, thirty (30) hours with a curriculum as determined by the Chief to be completed within six (6) months of appointment;
 - (2) In addition, each voting member must receive an additional ten (10) hours of training per year with a curriculum as determined by the Chief; and
 - (3) Each voting member must accompany an on-duty police officer employed by the CRPD for a minimum of sixteen (16) hours per year and for a minimum of four (4) hours per occasion.
- (C) Two (2) police officers will be appointed to serve by the Chief as liaisons to the CRB, ensuring at least one (1) of the officers will be available to attend all meetings with only one (1) officer in attendance in closed sessions, at the discretion of the CRB to serve as a resource. Police officer liaisons will serve as a technical resource and subject matter experts at the discretion of the CRB and serve as a communication conduit between the CRPD and the CRB. The police officers appointed by the Chief shall serve a two-year term ending on June 30 in even-numbered years, and will:
- (1) Have been a CRPD officer for more than seven (7) years;
 - (2) Have participated in ethics training;
 - (3) Have strong community relations experience;
 - (4) Hold a rank of Sergeant or below; and
 - (5) May not serve as a CRB liaison more than two (2) consecutive terms.
- (D) The City Council will provide the necessary resources to allow the CRB to perform the duties and functions assigned to the CRB by this chapter.
- (E) The CRB will annually elect a Chairperson and a Vice-Chairperson from among its members. The Chairperson may serve for no more than 2 consecutive 12-month periods. The Vice-Chairperson may serve for no more than 2 consecutive 12-month periods. The election of officers will be held at the first regularly scheduled meeting after the first of the year.
- (F) The CRB may adopt, amend, or rescind such rules as may be necessary for the conduct of its business.

(003-21; 048-22)

74.03 - GENERAL POWERS AND DUTIES OF THE CITIZEN REVIEW BOARD.

The CRB will have the following powers and duties to:

- (A) Require, receive and review quarterly reports from the Chief, including data such as traffic stops and arrests with breakdowns of the attending demographic information by race and ethnicity;
- (B) Review police data to identify areas for improvement and create a baseline for each area and keep track of progress;
- (C) Appoint a member of the CRB to serve on any Police Chief Candidate selection committee, and appoint additional members of the CRB, as needed, to provide 20% representation on the committee;

- (D) Oversee a monitoring system for tracking of complaints lodged against sworn police officers with either the CRPD, or the City Clerk to give the City Council sufficient information to assess the overall performance of the these matters and to assess the performance of the CRB in the fulfillment of its duties;
- (E) Develop, implement, and from time to time amend as necessary, a program of community outreach aimed at soliciting public input from the broadest segment of the community in terms of geography, culture, ethnicity, and socio-economics. The CRB will report its community outreach efforts to the City Council on an annual basis. As a part of this program, the CRB must hold at least one community forum each year for the purpose of hearing views on the policies, practices, and procedures of the CRPD, review police practices, procedures, and written policies as those practices and procedures relate to the CRPD's performance as a whole, and report its recommendations, if any, to the City Council, City Manager and Police Chief; and
- (F) Engage in a long-term planning process through which it identifies major problems or trends, evaluates the efficacy of existing law enforcement practices in dealing with the same, and establishes a program of resulting policy suggestions and studies each year. The CRB will review and analyze policy, analysis studies, and trend data collected or developed by the CRPD, and by majority vote, recommend policies relating to training programs and procedures or other matters related to the CRPD. The CRB's policy recommendations will be submitted to the Chief and to the City Council. The Chief will respond in writing within 45 days to any such policy recommendations by the CRB, and indicate whether they will be followed through Department Directives or should be adopted as policy by the City Council or explain any reasons why such policy recommendations will not be followed or should not be adopted.

(003-21)

74.04 - CITIZEN COMPLAINTS OF ALLEGED POLICE MISCONDUCT.

(A) Making and Filing Complaints.

- (1) Any person with personal knowledge of alleged police misconduct may file a complaint. In order to have "personal knowledge", the complainant must have been directly involved in the incident or witnessed the incident. If a juvenile wants to make a complaint against an officer, the complaint will be taken in the same manner as if an adult filed it. Once a complaint is taken from a juvenile, an attempt must be made to notify the juvenile's parent or guardian concerning the complaint and the circumstances involved. This notification will be documented in the final report provided to the Chief by the Professional Standards unit of the CRPD (hereinafter referred to as "Professional Standards"). The person or official filing the complaint may hereafter be referred to as the "complainant."
- (2) Complaints may be filed in person or online with the CRB, the CRPD, or the City Clerk's office. The date, time, and name of the person receiving the complaint shall be recorded on the complaint form and submitted in a timely manner to Professional Standards. Each office shall record the receipt of all Complaints and provide notice of receipt of all complaints to the others when received; and
- (3) Complaint forms will be available to the public online and in easily accessible locations. Personnel in the

City Clerk's Office, sworn police officers, and non-sworn police staff will be available to receive complaints. All complaints must be filed within ninety (90) days of the alleged misconduct. Any complaints that do not involve the conduct of a sworn police officer or are not filed within ninety (90) days of the alleged misconduct may be investigated by the Professional Standards unit and may be subject to summary dismissal by the CRB. If the complaint is against the Chief, the City Manager will perform the Chief's duties set forth herein below.

(B) Police Department Investigation of Complaints.

- (1) The Chief will direct Professional Standards to conduct an investigation of each complaint received ("PSI"). The PSI will be conducted pursuant to the Department Directives established by the Chief, as well as the conditions herein. The Department Directives will be a public record and readily available to the community. All investigations will be performed in a manner designed to produce a minimum of inconvenience and embarrassment to all parties, including the complainant, the police officer, and other witnesses.
- (2) All PSI will include an interview of the complainant. The complainant may have a neutral City employee or some other person chosen by the complainant present during the interview. Any police officer who is implicated by a complaint shall have the right to have legal counsel or a union representative present during the officer's interview.
- (3) Professional Standards will prepare and forward a report of its investigation to the Chief within sixty (60) days after the complaint is filed. The PSI report will include detailed findings of fact as to the allegations in the complaint. The report will also set forth a written conclusion that explains why and the extent to which the complaint is either "exonerated" (meaning the officer acted in conformance with policies and procedures); "unfounded" (meaning the incident in question is found to have not occurred as stated by the complainant); "unsubstantiated" (meaning there is insufficient evidence to prove or disprove the complaint); "sustained" (meaning the incident in question is found to have occurred as alleged by the complainant); "commended" (meaning the officer acted properly and should be commended in the handling of the situation); or "policy failure" (meaning the officer acted in conformance with established policy, but the policy needs to be amended).
- (4) The Chief will conduct a review of the PSI report and may do any or all of the following: conduct interviews or request Professional Standards to conduct additional investigation; request additional information, or that additional questions be asked; interview or direct that other persons or witnesses be interviewed; request that other documents be reviewed or retrieved; and take any other investigative steps the Police Chief deems appropriate.
- (5) The Chief will forward a Police Chief's report to the CRB. The Police Chief's report will include the following:
 - a. Detailed written findings of fact and evidence concerning the allegations in the complaint (names of witnesses, victims, and Police Officers will not be included and shall be replaced by unique identifiers for each of these individuals). Faces and names will be edited out of any media provided to the CRB;
 - b. A written conclusion that explains why and the extent to which the complaint is either "sustained",

"unfounded", "exonerated", "unsubstantiated", "commended", "policy failure";

- c. A written summary of remedial actions, if any, including amending the current policies or adopting new policies;
 - d. A description of any disciplinary action recommended by the current disciplinary matrix contained within the CRPD Disciplinary System Policy issued by the Chief (hereinafter referred to as the "Disciplinary Matrix"). Nothing in this chapter will prevent the Police Chief from taking disciplinary action prior to the CRB's review of the complaint; and
 - e. The Chief's certification that the PSI was conducted in conformance with the CRPD's Department Directives.
- (6) A copy of the Police Chief's report to the CRB shall be given to the police officer and the City Manager;
 - (7) The Chief's report must be delivered to the CRB, along with findings of fact and all available evidence and audio and visual recordings, within thirty (30) calendar days after the Professional Standards report is issued to the Chief, unless the Chief demonstrates good cause for additional time; and

(C) CRB Review of the Police Chief's Report.

- (1) The CRB will review all Police Chief's reports, or City Manager's Reports regarding complaints made against the Police Chief. The CRB may require the Chief to meet with the CRB to review and discuss the Report. To the extent possible, such meetings may be in closed session as allowed by Iowa Code Chapter 21. All CRB deliberation of the Chief's report will be discussed in a closed session with all discussions, correspondence, and minutes/records of the closed session deemed confidential documents and not released to the public. The CRB may request subject matter experts participate in the conversation during open and closed sessions, and request additional information from the Chief or other entities to supplement its review.
- (2) The CRB will decide, on a majority vote, the level of review to give each Police Chief's report, and the CRB may select any or all of the following:
 - a. Agree with no additional information or investigation requested;
 - b. Request additional investigation by the Chief or City Manager, request additional information; and
 - c. Disagree and provide recommendations to the Chief.
- (3) The CRB will apply a "reasonable basis" standard of review when reviewing the Police Chief's report. When reviewing the report's evidence, the CRB will rely on evidence reasonably prudent persons are accustomed to rely upon in the conduct of their serious affairs.
- (4) The CRB may recommend that the Police Chief reverse or modify the Chief's findings only if the CRB determines that:
 - a. The findings are not supported by substantial evidence;
 - b. The findings are unreasonable, arbitrary or capricious; or
 - c. The findings are contrary to a CRPD Department Directive, or federal, state, or local law.

The Police Chief will respond in writing to the CRB's recommendations within thirty (30) days.

- (5) If the CRB disagrees with the decision of the Police Chief the CRB may issue a written response to the Chief in which of the three (3) standards in Section 74.04(C)(4) upon which the CRB's disagreement is based. Thereafter the Chief will meet with the CRB to discuss the disagreement. This meeting may be closed as allowed by Iowa Code 21. Such meeting will take place prior to the issuance of the CRB's public report to the City Council. If after the meeting with the Chief, as outlined in this subsection, and the CRB still disagrees with the Chief's report, the CRB by majority vote, remand the case to the State of Iowa Office of Ombudsman, the Iowa Civil Rights Commission, a governmental independent arbiter approved by both the CRB and the City Council and request an independent investigation.
- (6) If the CRB finds that the disciplinary action indicated by the Police Chief, for investigations that result in sustained civilian police complaints, is out of conformance with the Discipline Matrix, the CRB may recommend other discipline that conforms with the Discipline Matrix. Imposition of the recommended discipline is at the discretion of the Chief, but if the Chief does not follow the disciplinary recommendation of the CRB, the Chief must respond in writing, within 30 days, with the Chief's reasons as to why the recommended discipline was not imposed.
- (7) At the conclusion of the CRB's review, the CRB will issue a public report to the City Council concerning the investigation of the complaint. Such public report will include detailed findings of fact concerning the complaint, together with a clearly articulated conclusion that explains the disposition of the complaint. The public report will not include the names of the complainant(s), witness(es) or the police officer(s). In addition, the CRB's public report will not include any discipline or personnel matters, although the CRB may comment generally as to whether the CRB believes discipline is appropriate without commenting on the extent or form of the discipline. A copy of this public report to the City Council shall be given to the complainant(s), the police officer(s), the Police Chief, and the City Manager.
- (8) The CRB's report to the City Council must be completed within ninety (90) calendar days of receipt of the Chief's report unless the CRB demonstrates good cause for additional time.
- (9) Review of the Chief's report for each case by the CRB may occur after all pending investigations, legal proceedings, and any applicable appeals, grievances, or other review of the incident have been completed.

(003-21)

74.05 - DUTIES OF THE CITY MANAGER.

If a complaint is filed concerning the Chief, the City Manager's report will include the same findings of fact and conclusions as required for the Chief's report.

(003-21)

74.06 - POLICE OFFICER'S AND COMPLAINANT'S RIGHTS PRESERVED.

All rights enjoyed by sworn police officers employed by the City are preserved in this chapter, and nothing herein is intended to waive, diminish or interfere with any such rights protected by Iowa's civil service laws or any other applicable state or federal laws.

(003-21)

(Note: Chapter 74 adopted by Ordinance No. 003-21, passed February 9, 2021)

DIVISION 10.5. - CITIZEN REVIEW SUBCOMMITTEE

Footnotes:

--- (28) ---

Editor's note— C.B. No. 2010-088, § 1, adopted June 1, 2010, repealed former Div. 10.5, §§ 2-532—2-540 in its entirety. Former Div. 10.5 pertained to Liquor Advisory Commission. See Code Comparative Table—Ordinances for derivation.

Sec. 2-532. - Establishment and purpose.

The Citizen Review Subcommittee is established for the following purposes:

- (1) Promote public confidence in the professionalism and accountability of the City of Champaign's Police Department through unbiased review of the investigation of citizen complaints and thoughtful policy recommendations and on-going public outreach.
- (2) Add a citizen perspective to the evaluation of citizen complaints.
- (3) Provide a timely, fair, and objective review of citizen complaints and the manner which they are investigated.
- (4) Provide a systematic means to achieve continuous improvement in citizen and police interactions.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17)

Sec. 2-533. - Composition.

- (a) The Citizen Review Subcommittee shall be a subcommittee of the Human Relations Commission and shall consist of five (5) members. The Mayor may appoint members to the subcommittee. At least one member shall be a member of the Human Relations Commission. The other members may be from the community.
- (b) After the initial appointments for staggered terms, subsequent members shall serve a three-year term. The terms of the initial appointees shall be staggered as follows:
 - (1) One person shall serve a one-year term.
 - (2) Two (2) persons shall serve a two-year term.
 - (3) Two (2) persons shall serve a three-year term.
- (c) No member shall serve more than two (2) consecutive terms.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17)

Sec. 2-534. - Qualifications for membership.

- (a) All members must possess a reputation of fairness, integrity and a sense of public service.
- (b) No current elected official or City employee may serve on the subcommittee.

- (c) The appointments shall reflect community diversity, including different neighborhoods, income levels, ethnic gender and experience.
- (d) Members must be willing to play an active role in the community by publicizing the citizen complaint process and whenever possible, providing appropriate outreach to the community.
- (e) Members must commit to attending meetings regularly and participating in other initiatives of the subcommittee.
- (f) Members of the subcommittee who are also members of the Human Relations Commission shall not maintain membership on the subcommittee if they have been removed or resigned or if their term has expired from the Human Relations Commission.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17)

Sec. 2-535. - Training and orientation.

- (a) The Chief Equity Officer, in coordination with the Chief of Police, shall develop written standards for orientation, training and continuing education for the subcommittee members.
- (b) All appointees must complete the initial training and orientation before the first formally convened meeting.
- (c) Training may include police ride-alongs and firearms simulator training.
- (d) All members must sign a confidentiality and non-disclosure form.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17; C.B. No. 2022-001, § 2(Exh. B), 1-18-22)

Sec. 2-536. - Rules and procedures.

- (a) The members of the subcommittee shall select a Chairperson and a Vice Chairperson from among its members at the first regular meeting after July of each year or as soon as practical thereafter. The Chairperson shall serve a one-year term.
- (b) The Equity and Engagement Department will provide staff support that consists of taking meeting minutes and maintaining an accurate record of all meetings.
- (c) Meetings shall be held in conformance with the Open Meetings Act.
- (d) Meetings shall be held every other month on a date and time fixed by the subcommittee.
- (e) Special meetings may be held if needed.
- (f) The Chief Equity Officer or the designee of the Chief Equity Officer shall assist the subcommittee in developing rules of procedure as are necessary or desirable for the conduct of business.
- (g) The entire review of a single complaint shall be concluded in a single meeting, if practical.
- (h) The Police Chief or the City Attorney may request a suspension of the review if there is a separate criminal investigation underway or if civil action against the City is threatened, underway or pending.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17; C.B. No. 2018-092, § 1, 6-19-18; C.B. No. 2022-001, § 2(Exh. B), 1-18-22)

Sec. 2-537. - Subcommittee responsibilities.

- (a) The purpose of the subcommittee's review shall be to determine if the completed internal investigation, prior to any final decision on discipline made by the Chief of Police, is complete, thorough, objective and fair based on:
 - (1) The thoroughness with which each allegation has been investigated.
 - (2) The extent to which witnesses and/or persons known to have information, knowledge, or evidence pertaining to the allegation(s) were contacted or interviewed.
 - (3) The manner and tone in which interviews were conducted with the complainant, witnesses, involved officer/employees and other persons having knowledge relating to the allegations.
 - (4) The process of seeking, collecting and maintaining evidence pertaining to the investigation.
 - (5) The extent to which information and/or leads developed in the course of the investigation were thoroughly followed.
 - (6) The factual and logical basis of any findings or conclusions reached during and/or after the completion of the investigation.
- (b) The subcommittee may review all documents, statements, recordings, evidence and other information relating to the investigation provided as follows:
 - (1) The identity of the Officer and the Complainant shall remain anonymous.
 - (2) These documents are available only to the subcommittee and are not to be made public during the pendency of the investigation.
 - (3) The following information shall not be made available to the subcommittee without the officer's consent, in writing: the officer's medical or psychological information, the officer's home address or phone number, the officer's Social Security number, any information relating to the officer's beneficiaries under any insurance or retirement program or any information identifying the officer's spouse or other relative.
 - (4) Pursuant to a Freedom of Information request, the City Attorney shall review and approve all documents before they can be made public.
 - (5) Access to certain information may be restricted in conformance with applicable laws.
- (c) The Subcommittee may request the Chair of the Human Relations Commission issue a subpoena for citizen-witness testimony or for records if the subcommittee has been unable to obtain this information voluntarily. The request for a subpoena must state why the testimony is required and the attempts made to obtain the information voluntarily. This section does not apply to police officers.
- (d) The Subcommittee shall provide a written report summarizing its findings upon completion of its review of a completed investigation to the Chief of Police.

- (e) A representative of the Police Department command staff assigned by the Police Chief and the Chief Equity Officer or the designee of the Chief Equity Officer shall be present during the review to answer questions, provide explanations or provide other assistance if needed.
- (f) Pursuant to the applicable collective bargaining agreement, only the Police Chief and the City Manager are empowered to impose discipline.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17; C.B. No. 2022-001, § 2(Exh. B), 1-18-22)

Sec. 2-538. - Member responsibility.

- (a) The members shall conduct themselves in a manner that maintains public confidence in the integrity of the subcommittee.
- (b) Members shall refrain from pre-judging or making any comments outside of the committee meetings regarding any pending complaint or investigation.
 - (1) General patterns and trends.
 - (2) Procedural matters.
 - (3) Information previously released to the public.
 - (4) Any other non-confidential or non-privileged material discussed in the course of the subcommittee proceedings.
- (c) No member shall have any discussions outside of the formally convened meeting with any person, including other subcommittee members, regarding any investigation under review.
- (d) A member shall recuse him or herself from deliberations in which he or she has a personal, professional or financial conflict of interest of any nature.
- (e) A violation of any of these provisions may be grounds for immediate removal from the subcommittee by the mayor.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17)

Sec. 2-539. - Periodic reports.

- (a) The subcommittee and the Chief Equity Officer or the designee of the Chief Equity Officer shall jointly prepare annual reports to the Human Relations Commission summarizing their activity. These reports should include:
 - (1) Geographic information.
 - (2) Demographic information for both officers and subjects.
 - (3) Discussion of issues of interest undertaken by the subcommittee which may include suggested policy and or procedural changes.
 - (4) Updates on prior issues and/or recommendations.

(5) Information on all public outreach initiatives undertaken by the Commission.

(6) Recommendations regarding Police practices and policies regarding interaction with citizens.

(b) The reports provided for in this subsection will be made available to the public and be discussed at a regular meeting of the Human Relations Commission.

(C.B. No. 2017-172, § 1(Exh. A), 8-1-17; C.B. No. 2022-001, § 2(Exh. B), 1-18-22)

Sec. 2-540. - Reserved.

Introduced: March 5, 2024
Adopted: March 19, 2024
Effective: March 27, 2024

**ORDINANCE 1533:
ORDINANCE AMENDING EAST LANSING INDEPENDENT POLICE OVERSIGHT
COMMISSION**

THE CITY OF EAST LANSING ORDAINS:

DIVISION 12. POLICE OVERSIGHT COMMISSION¹

Sec. 2-472. Purpose.

The purpose of this commission is to increase accountability of the East Lansing Police Department and to strengthen conditions leading to trust in the police department by the community that it is pledged to serve. Because the city council is committed to the goal of racial equity, the commission will give priority to addressing racial inequities as well as use of force in policing. The commission will enable members of the community to participate in reviewing and making recommendations about police department policies, practices, and procedures, and it will provide means for prompt, impartial, and fair review of complaints brought by individuals against police officers or the police department.

The commission's role is advisory. The commission does not possess or exercise administrative or supervisory authority over the East Lansing Police Department or its employees.

(Ord. No. 1503, 7-13-2021)

Sec. 2-473. Definitions.

[The following words, terms and phrases, when used in this division, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:]

Commission means the Independent Community Police Oversight Commission.

Complaint means an allegation of excessive force, sexual abuse, racial, ethnic, religious, or gender discrimination, mishandling of evidence, or other abusive behavior, patterns or practices by the police department or a department employee.

Confidential information means records or information specifically described and exempted from disclosure by statute. For purposes of this division, "confidential information" does not include a permissible exemption that a public body is permitted to invoke under section 13(1) of the Freedom of Information Act, 1976 PA 442, as

¹Editor's note(s)—Ord. No. 1327, adopted Feb. 18, 2014, repealed former div. 12, §§ 2-491 and 2-492, which pertained to the active living for adults advisory commission, and derived from Ord. No. 1249, adopted Sept. 21, 2010.

Subsequently, Ord. No. 1503, enacted a new Div. 12 to read as herein set out.

amended, MCL 15.243(1). "Confidential information" only includes mandatory exemptions from public disclosure that a state or federal statute or rule requires a public body to invoke.

Corrective action plan means a modification to or elimination of an existing ELPD policy, procedure, rule, regulation, or general order; or the addition of a new ELPD policy, procedure, rule, regulation, or general order. "Corrective action plan" shall not include any aspect of employee discipline.

Criminal justice system means law enforcement, including the police, courts, prosecution and defense lawyers, as well as agencies for detaining and supervising people, such as prisons, jails, lockups, and probation agencies.

Disciplinary complaint means a complaint that alleges employee misconduct.

Individual in crisis means a person who exhibits symptoms of known, suspected, or perceived behavioral or mental health conditions, including, but not limited to, mental illness, intellectual or developmental disabilities, or substance use disorders.

Investigation or investigate means searching for and collecting information and records, regardless whether a complaint is involved or contemplated.

Policy complaint means a complaint that alleges a deficiency or problem with a police department policy or practice.

(Ord. No. 1503, 7-13-2021)

Sec. 2-474. Commission members.

- (a) East Lansing City Code, section 2-241 et seq., governs the commission except to the extent modified in this division.
- (b) The commission shall include 11 members.
- (c) Members shall serve three-year staggered terms. A member may serve no more than two consecutive full terms.
- (d) The city may remove a member who breaches the member's promise to protect confidential information.
- (e) At least two commission members shall be licensed social workers or psychologists professionally engaged in helping people experiencing crisis, homelessness, mental illness, substance use disorders, or domestic abuse.
- (f) The city council shall appoint people to the commission who reflect the city's diverse population and particularly segments of the community that are protected by the civil rights ordinance. These include diverse people based on race, ethnicity, national origin, income level, age, student status, gender, disability, sexual orientation, and gender identity or expression. People who are vulnerable and have been marginalized and who tend to have significant negative interactions with the police should be amply represented. Having an arrest or conviction record is not a disqualification for membership on the commission. Up to two members of the commission who contribute to the desired composition of the commission as described above may be persons who are not residents of East Lansing.

(Ord. No. 1503, 7-13-2021)

Sec. 2-475. Independence.

- (a) The commission's staff and offices shall be separate from the police department to the extent feasible.

- (b) The city shall not appoint a person to the commission if the person has, in the past two years, held a job that requires licensure by the Michigan commission on law enforcement standards.
 - (c) No member may hold a job that requires licensure by the Michigan Commission on Law Enforcement Standards.
 - (d) No member may be a candidate or applicant for employment in the police department.
- (Ord. No. 1503, 7-13-2021)

Sec. 2-476. Commission duties.

- (a) The scope of the commission is the criminal justice system in East Lansing, both within the police department and relating to the police department. The commission may investigate matters within its scope by collecting information from the city and other sources.
- (b) The commission may conduct an investigation on its own initiative or in response to a request from the city council or a member of the public.
- (c) If 20 residents of the city sign a petition on an issue of concern within the scope of the commission, the commission shall hold a special hearing for the purpose of inquiring into the petitioners' concern.
- (d) The commission will hold at least one meeting annually designed to receive input from the public.
- (e) The commission and members of the commission may participate in events, organize events, engage in public education, and listen to people in the Lansing Metropolitan Area concerning matters within the commission's scope.
- (f) The commission may make recommendations, file disciplinary and policy complaints, and refer matters to the Michigan Commission on Law Enforcement Standards or other agencies.
- (g) The commission may make recommendations to the city regarding policy and practice within the police department and relating to the police department.
- (h) The commission may investigate the 911 dispatch system and the availability of unarmed emergency response service agencies, such as social work agencies, trained and able to alleviate dangerous or threatening situations. The commission may make recommendations to the city and county regarding dispatch systems.
- (i) The commission may recommend that the city council make changes in policy regarding criminal charges under the city Code.
- (j) The commission may research and recommend grant opportunities to help improve the criminal justice system in East Lansing.
- (k) The commission may investigate the training that police officers and supervisors receive or access. The commission may investigate the training that is available to police officers and supervisors. The commission may make recommendations regarding training.
- (l) The commission may review the police department's accreditation status and make recommendations about how to implement accreditation standards in a way that best benefits the community.
- (m) The commission may investigate the police department's early intervention system and make recommendations regarding maximizing the effectiveness of that system.
- (n) The commission may collect and analyze data on matters within and relating to the police department. The commission may contract with a professional researcher to design and carry out research. The commission may issue reports and make policy recommendations based on research.

Created: 2022-08-18 14:22:27 [EST]

- (o) The commission may communicate with insurance industry risk management services available to the police department.
- (p) Given the limited time and resources available to the commission, and the enormity of its task, the commission may prioritize its work and shall report its priorities to the city council and the public.

(Ord. No. 1503, 7-13-2021)

Sec. 2-477. Staff.

- (a) The city shall assign staff to perform functions for the commission pursuant to section 2-251 of the East Lansing City Code.
- (b) The city shall also assign staff to maintain a separate website and other social media platforms for the commission.
- (c) Staff members assigned to the commission shall not be employees of the police department.

(Ord. No. 1503, 7-13-2021)

Sec. 2-478. Panel of investigators.

The city council or city manager shall prepare a list of professional investigators, licensed under the Professional Investigator Licensure Act, MCL 338.821 et seq., or possessing equivalent qualifications, and available to conduct investigations for the commission.

(Ord. No. 1503, 7-13-2021)

Sec. 2-479. Education of commission members.

- (a) The commission and members of the commission shall keep informed as to the latest practices in the field of police accountability and inaugurate new commission practices that appear to be of benefit to the commission's service and to the public.
- (b) The commission may facilitate training and other activities for commission members in cooperation with the police department. The police department shall allow members of the commission to participate in suitable training and activities. Members may choose to participate in those trainings and activities.
- (c) Members of the commission may join state or national organizations whose scope is similar to the commission's scope, pay dues and fees, and attend events and educational opportunities sponsored by those organizations.

(Ord. No. 1503, 7-13-2021)

Sec. 2-480. Free speech.

The city recognizes the right of the commission and its members to speak freely on matters within the commission's scope, except for disclosure of protected confidential information. The city shall not retaliate against the commission or a commission member for exercising that right. Members of the commission must not represent that they are speaking on behalf of the city council, city manager, or police department.

(Ord. No. 1503, 7-13-2021)

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

Sec. 2-481. Budget.

The commission shall prepare an itemized estimate of its expenditures for each coming year, pursuant to section 10.2 of the East Lansing City Charter, and the city manager shall include in the budget recommendation sufficient financial support for the commission's activities, including:

- (a) Investigations and complaints.
- (b) Research and evaluations.
- (c) Public outreach and recommendations.
- (d) Publication production, website and social media.
- (e) Commission member education.

(Ord. No. 1503, 7-13-2021)

Sec. 2-482. Adjustment for impact on the police department.

If the commission makes a recommendation to the police department which has financial implications, and the department chooses to accept the recommendation, then the department may propose to the city manager a budget item to cover compliance with the recommendation.

(Ord. No. 1503, 7-13-2021)

Sec. 2-483. Evaluations.

Every four years, the city council shall contract with a qualified agency, with experience in evaluating police oversight boards, to evaluate the commission and its work.

(Ord. No. 1503, 7-13-2021)

Sec. 2-484. Disorderly conduct and R&O charges.

- (a) The commission may investigate police and court records and track criminal cases in which the city charges individuals with disorderly conduct under the East Lansing City Code, section 26-52.
- (b) The commission may investigate and track criminal cases in which the Ingham County prosecutor charges individuals with assaulting, battering, wounding, resisting, obstructing, opposing or endangering a police officer or other state authorized person or public official, charges commonly referred to as "resisting and obstructing" or "R&O", under MCL 750.81d.
- (c) When those disorderly conduct and R&O cases are finally adjudicated, the commission may publish summaries of the underlying facts and case dispositions.
- (d) The summaries shall describe behavior but not include the names of individuals.

(Ord. No. 1503, 7-13-2021)

Sec. 2-485. Use of force incident summaries.

- (a) The police department shall provide a monthly report to the commission summarizing each incident involving use of force by a police officer against a person. The report shall include at a minimum, a brief

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

description of the incident and the names and demographic data about the officers and members of the public involved in the incident. The report shall not include any information regarding the discipline, if any, that was issued to the officer(s) involved in the incident. The commission may choose to conduct additional investigation of an incident, but shall not make any recommendations regarding any aspect of employee discipline.

- (b) Annually, the commission shall publish summaries of use-of-force incidents based on the police department reports and the commission's investigations. Published summaries shall describe behavior but not include the names of individuals.

(Ord. No. 1503, 7-13-2021)

Sec. 2-486. Encounters with people experiencing homelessness.

- (a) Every six months, the police department shall provide a report to the commission summarizing each incident where a police department employee transports, arrests, issues a citation to, or stops (based on reasonable suspicion) a person who is or appears to be experiencing homelessness, including at a minimum, a brief description of the incident. In the case of a citation, arrest, or stop, the report shall include names and demographic data about the officers involved in the incident and demographic data about the other people involved in the incident. The commission may choose to conduct additional investigation of an incident.
- (b) Annually, the commission shall publish summaries of police encounters with people experiencing homelessness based on the police department reports and the commission's investigations. Published summaries shall describe behavior but not include the names of individuals.

(Ord. No. 1503, 7-13-2021)

Sec. 2-486a. Encounters with individuals in crisis.

- (a) Every six months, the police department shall provide a report to the commission summarizing each incident in which a police department employee transports, arrests, issues a citation to, or stops (based on reasonable suspicion) an individual in crisis. The report shall include, at a minimum, a brief description of the incident. In the case of a citation, arrest, or stop, the report shall include the names and demographic data about the officers and demographic data about the other people involved in the incident. The commission may choose to conduct additional investigation of an incident.
- (b) Annually, the commission shall publish summaries of police encounters with individuals in crisis based on the police department's reports and the commission's investigations. Published summaries shall describe behavior but not include the names of individuals.

(Ord. No. 1503, 7-13-2021)

Sec. 2-486b. Encounters with juveniles.

- (a) Every six months, the police department shall provide a report to the commission summarizing each incident in which a police department employee transports, arrests, issues a citation to, or stops (based on reasonable suspicion) a juvenile. The report shall include, at a minimum, a brief description of the incident. In the case of a citation, arrest, or stop, the report shall include the names and demographic data about the officers and demographic data about the other people involved in the incident. The commission may choose to conduct additional investigation of an incident.

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

- (b) Annually, the commission shall publish summaries of police encounters with juveniles based on the police department's reports and the commission's investigations. Published summaries shall describe behavior but not include the names of individuals.

(Ord. No. 1503, 7-13-2021)

Sec. 2-487. Annual reports.

- (a) In its annual report to the city council pursuant to section 2-252 of the East Lansing City Code, the commission shall include a summary of its work during the previous year and its work priorities for the coming year. The report shall be published or posted on the commission's website.
- (b) Annually, the commission shall publish or post on its website any summaries of significant encounters between civilians and the police that the commission has compiled in the past year regarding:
 - (1) Use-of-force incidents.
 - (2) Criminal cases involving charges of "disorderly conduct" and "resisting and obstructing."
 - (3) Incidents in which the police department transports, arrests, issues a citation to, or stops (based on reasonable suspicion) a person experiencing homelessness.
 - (4) Incidents in which the police department transports, arrests, issues a citation to, or stops (based on reasonable suspicion) an individual in crisis.
 - (5) Incidents in which the police department transports, arrests, issues a citation to, or stops (based on reasonable suspicion) a juvenile.

(Ord. No. 1503, 7-13-2021)

Sec. 2-488. Brady lists.

- (a) The commission may investigate "Brady" or "Do Not Call" or similar lists maintained by the police, prosecutors, criminal defenders, and courts.
- (b) If a police department employee appears on such a list, the commission may refer that information to the police department or to the Michigan Commission on Law Enforcement Standards for their review.

(Ord. No. 1503, 7-13-2021)

Sec. 2-489. Summary of biased 911 calls.

The police department shall provide to the commission notice of any instances in which the department has referred a matter for prosecution for making a 911 call based in significant part on a person's race, color or national origin, allegedly in violation of section 22-36a of the East Lansing City Code. The department shall file the notice with the commission when it refers the matter to the city attorney.

(Ord. No. 1503, 7-13-2021)

Sec. 2-490. Confidential information.

- (a) If the commission asks for information from the police department and the information is confidential as described in subsection (b) or there is a compelling reason not to release the information to the public, then the commission and the department may agree to the procedure described in this section.

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

- (b) The police department may communicate the confidential information to the commission in a closed session at a meeting of the commission if a closed session is permissible under section 8 of the Michigan Open Meetings Act, Act 267 of 1976, MCL 15.261 et seq. The police department will not deliver written records of the confidential information to the commission, and the commission will not create public records that include the confidential information. The commission may, but is not required to, prepare a summary of the confidential information that it receives, and the summary is a public record. The summary shall include the following:
 - (1) The statute or rule that renders the information confidential;
 - (2) The source of the information;
 - (3) The author or authors;
 - (4) The date or dates when the information was produced or compiled; and
 - (5) A description of the information as detailed as possible without revealing privileged or confidential content.
- (c) In responding to a person's request for information in the records of the commission, the city will not invoke any of the discretionary exemptions listed in section 13(1) of the Freedom of Information Act, 1976 PA 442, as amended, MCL 15.243(1). For purposes of this section, a "discretionary exemption" is an exemption that a public body may invoke, but is not required to invoke.

(Ord. No. 1503, 7-13-2021)

Sec. 2-490a. Redactions.

- (a) If, in the course of a commission investigation, the police department or other department is obligated to disclose records to the commission, but the records contain confidential information that the department cannot by law release, or the department can demonstrate a compelling reason not to release the information, then the department may redact the confidential information in compliance with subsection (b). The oversight commission may appeal such a refusal to the city council. The city council's decision is final and is not subject to further appeal or judicial review.
- (b) The department shall produce a log that describes each particular redaction, including:
 - (1) The statute or rule that renders the information confidential;
 - (2) The source of the information;
 - (3) The author or authors;
 - (4) The date or dates when the information was produced or compiled; and
 - (5) A description of the information as detailed as possible without revealing privileged or confidential content.The commission may disclose that log to people outside the commission.
- (c) Staff planning in the police department with respect to multiple employees and job assignments in the police department shall not be treated as confidential personnel information.

(Ord. No. 1503, 7-13-2021)

created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

Sec. 2-490b. Investigation resources and personnel.

- (a) The commission may subscribe to fee-based information or investigation services that the commission deems necessary to investigate matters within its scope.
- (b) With the consent of the city council, the commission may retain a professional investigator to investigate a complaint alleging misconduct or unethical conduct, by the police department or a department employee, affecting a member of the public.

{Ord. No. 1503, 7-13-2021}

Sec. 2-490c. Cooperation.

- (a) City employees and departments shall cooperate with the information requests submitted by the commission or a professional investigator retained by the commission.
- (b) City employees and departments shall provide the information requested by the commission unless disclosure is prohibited by statute. In responding to the commission's request for information directed to the police department, the city will not rely on any of the discretionary exemptions listed in MCL 15.243(1) and will provide all information subject to a discretionary exemption unless there is a compelling reason for non-disclosure. The oversight commission may appeal such a refusal to the city council.
- (c) For purposes of this section, "discretionary exemption" includes exemptions that a public body may invoke, but does not include exemptions that a public body is required to invoke.
- (d) The police department shall not require the commission to file a freedom of information request as a prerequisite to disclosure of information, charge the commission a fee, or assert a discretionary exemption under section 13(1) of the Freedom of Information Act, 1976 PA 442, as amended, MCL 15.243(1), as justification for denying the commission's information request.
- (e) The police department shall respond to an information request from the commission within 21 days unless the commission and the department agree to a different schedule.
- (f) The police department may not charge the commission a fee for responding to the commission's information requests, but if the commission's information requests, overall, create a significant financial burden for the department, the city shall provide financial resources to the department to account for that burden.

{Ord. No. 1503, 7-13-2021}

Sec. 2-490d. City council resolution resolving information conflicts.

- (a) If a dispute arises between the commission and a city employee, official, or department regarding the disclosure of information requested by the commission, the city council shall hear the dispute and decide the matter by passing a formal resolution.
- (b) The city council shall give effect to statutes that render information confidential.
- (c) The city council is not bound by discretionary exemptions listed in the Freedom of Information Act but may invoke a discretionary exemption when there is a compelling reason to withhold the information. For purposes of this section, "discretionary exemption" includes an exemption that a public body may invoke, but does not include an exemption that a public body is required to invoke.

{Ord. No. 1503, 7-13-2021}

Created: 2022-08-18 14:22:27 [EST]

{Supp. No. 16, Update 2}

Sec. 2-490e. Freedom of Information Acts.

- (a) The commission may file requests under the state or federal freedom of information acts to seek information from public bodies outside the city's jurisdiction.
- (b) If the commission deems it necessary, the commission may recommend that the city council pursue legal action to obtain the information under subsection (a).
- (c) The city shall not charge a fee for responding to freedom of information act requests for records in the possession of the commission.

(Ord. No. 1503, 7-13-2021)

Sec. 2-491. Who may file a complaint?

Any person may file a complaint, including, but not limited to, residents, non-residents, city employees, police department employees, police department supervisors, and the commission.

(Ord. No. 1503, 7-13-2021)

Sec. 2-491a. Places where complaints may be filed.

- (a) The following offices and persons are approved to accept complaints from the public.
 - (1) Commission website or office.
 - (2) City clerk.
 - (3) City manager.
 - (4) Police department.
 - (5) Director of human resources.
 - (6) Diversity, equity, and inclusion administrator.
- (b) The commission may approve other offices or persons with whom complaints may be filed.

(Ord. No. 1503, 7-13-2021)

Sec. 2-491b. Police department complaint investigation.

- (a) When a complaint is submitted at an approved location, the person accepting the complaint shall document receipt of the complaint, keep a copy of the complaint, and forward the complaint as soon as possible to the police department and the commission.
- (b) The police department shall investigate each complaint. The department shall attempt to complete the investigation within 90 days. If the police department cannot complete an investigation within 90 days, the department shall notify the commission and explain the circumstances.
- (c) If a complaint has taken longer than 90 days to complete, then every 30 days thereafter, the department shall send the commission a tracking report together with an explanation of the progress of the investigation.

(Ord. No. 1503, 7-13-2021)

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

Sec. 2-491c. Complaint forms.

- (a) The commission may establish a standard complaint form for complaints submitted by members of the public. The form shall ask the complainant to explain what they want to see happen as a result of the complaint, and it will ask whether the complainant wishes to engage in mediation. If the complaint is based on an incident, the form shall ask the complainant to explain what happened.
- (b) An office or person authorized to accept complaints shall accept a complaint even if the complainant fails to complete a standard complaint form. If a complaint is verbal, the person who accepts the complaint shall give the complainant an opportunity to complete the standard complaint form. If a complaint is verbal, and the complainant does not put it in writing, the person who accepts the complaint shall make a written memorial of the complaint.
- (c) A complaint may be accepted even if it is anonymous.

(Ord. No. 1503, 7-13-2021)

Sec. 2-491d. Classifying complaints.

- (a) The police department shall develop and publish separate protocols for investigating disciplinary complaints, policy complaints, and internal complaints. An "internal complaint" is a disciplinary action initiated by the department that does not involve employee behavior that affects a member of the public. The commission may make recommendations regarding the protocols.
- (b) When the police department receives or initiates a complaint of any kind, the police chief shall determine whether to classify the complaint as a disciplinary, policy, or internal complaint, or a combination. The department shall initiate the appropriate protocol.
- (c) The commission may inquire about complaints of any kind that are being investigated by the police department. The commission may recommend that the department change the classification of a complaint or the protocol used to investigate it.

(Ord. No. 1503, 7-13-2021)

Sec. 2-491e. Complaint tracking.

- (a) When the police department receives or initiates a complaint of any kind, the department shall assign a tracking number and develop a tracking report. The commission may specify the information to be included in tracking reports.
- (b) At a minimum, tracking reports shall include a brief description of the complaint. If a complaint involves an incident in which a member of the public is involved, the tracking report shall contain, at a minimum, a brief description of the incident and the names and demographic data about the department employees and members of the public involved in the incident.
- (c) Quarterly, the police department shall submit a tracking report to the commission for each pending complaint of any kind active in the department at any time during the quarter.

(Ord. No. 1503, 7-13-2021)

Sec. 2-491f. Mediation of disciplinary complaints.

- (a) The commission may facilitate mediation of any disciplinary complaint filed with the commission or with the police department that involves a citizen and an individual police officer if both the citizen and the officer consent to mediation. If a complaint form is established under section 2-491c, the complaint form will ask whether the complainant wishes to engage in mediation.
- (b) If the police department and the involved individuals agree, investigation of the disciplinary complaint shall be suspended and the matter referred to mediation. When mediation is complete, the police department shall decide whether to close or resume investigation of the disciplinary complaint.
- (c) The commission shall develop a procedure for mediation.
- (d) The city shall cover the cost of mediation services.

(Ord. No. 1503, 7-13-2021)

Sec. 2-492. Police department investigation findings.

When the police department completes its investigation, but before the police department determines a disposition for the case, the investigator shall make one or more of the following findings with respect to each disciplinary or policy complaint:

- (a) Sustained where the review discloses sufficient facts to prove the allegations made in the complaint.
- (b) Not sustained - where the review fails to disclose sufficient facts to prove or disprove the allegation made in the complaint.
- (c) Exonerated where the acts which provide the basis for the complaint occurred, but the review shows that such acts were proper.
- (d) Unfounded where the review shows that the act or acts complained of did not occur or were misconstrued.
- (e) Policy or practice - where there is a problem with department policy or practice. If this finding is made, the department shall produce a corrective action plan.
- (f) No finding - where, for example, the complainant failed to produce information to further the investigation; or where the investigation revealed that another agency was responsible, and the complaint or complainant has been referred to that agency; or where the complainant withdrew the complaint; or where the complainant is unavailable to clarify the complaint; or where the officer is no longer employed by the city.
- (g) Mediated where the complaint is resolved by mediation.
- (h) Criminal - where a criminal investigation has been opened.
- (i) Referred - where a complaint has been referred to another agency.

(Ord. No. 1503, 7-13-2021)

Sec. 2-493. Commission investigation and recommendation.

- (a) Within ten days after the police department completes an investigation of a policy complaint or a disciplinary complaint involving behavior affecting a member of the public, the department shall send the complete investigation record to the commission, subject to any redactions of confidential information. The

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

investigation record shall not include any information regarding the potential discipline, if any, to be issued to any police department employee involved in the complaint.

- (b) The commission shall make the investigation record it receives available to the public on request, subject to any promises to protect confidential information.
- (c) The commission shall give a complainant, a police department employee involved in a complaint, or other person who has information bearing on the complaint, an opportunity to provide information to the commission during a meeting. At the person's request, the meeting shall be in person if feasible.
- (d) The police department shall give the commission enough time to review the investigation record and conduct any investigation of its own before the police department takes final action. The commission shall complete its investigation as soon as possible, but no longer than 60 days, unless the police department agrees to a longer time.
- (e) The commission may recommend particular action, additional investigation on a specific issue, a change in the corrective action plan, or reclassification of the complaint and reinvestigation according to a different protocol.
- (f) The commission shall not make a recommendation regarding any aspect of a disciplinary complaint if the complaint does not involve employee behavior that affects a member of the public.
- (g) If the commission recommends additional investigation, and the police department does not agree with that recommendation, the commission may, with the consent of the city council, retain a professional investigator, who shall have the full force and authority of the city council to conduct an investigation under section 4.9 of the City Charter. The investigation shall be limited to the issue approved by the city council.
- (h) The commission may refer a matter to the Michigan Commission on Law Enforcement Standards for its review.
- (i) The commission shall not make any recommendation regarding the discipline to be issued, if any, to any police department employee involved in the complaint.

(Ord. No. 1503, 7-13-2021)

Sec. 2-494. Police chief decision and commission appeal.

- (a) Final disposition of the complaint on behalf of the police department shall be made by the police chief. The police chief shall issue a written opinion and send a copy to the commission. The written opinion shall not include any information regarding the discipline, if any, that was issued to any police department employee involved in the complaint.
- (b) If the commission disagrees with the findings of the police chief, the commission may, within 30 days after receiving the police chief's decision, recommend that the city manager modify or reverse the police chief's action. The city manager shall issue a written opinion and send a copy to the commission and the city council.

(Ord. No. 1503, 7-13-2021)

Sec. 2-495. Summaries of final action on complaints.

The commission shall publish a summary of the facts, as known to the commission, relating to each policy complaint and relating to each disciplinary complaint involving behavior affecting a member of the public. The summary shall include the underlying facts, a description of the steps and procedure used to decide the complaint, and the final decision. The summary shall not include any information regarding the discipline, if any, that was

Created: 2022-08-18 14:22:27 [EST]

(Supp. No. 16, Update 2)

issued to any police department employee involved in the complaint. The commission shall publish the summary on its website within 60 days after receiving the police chief's opinion or the city manager's opinion, whichever comes later. A published summary shall not include the names of individuals.

(Ord. No. 1503, 7-13-2021)

Sec. 2-496. Modification of existing policies.

- (a) Police department policies and procedures for processing mistreatment complaints shall not conflict with the procedures prescribed in this division.
- (b) The police department shall modify its existing procedures as necessary to conform to this division.

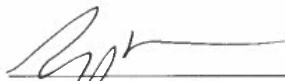
(Ord. No. 1503, 7-13-2021)

Secs. 2-497—2-500. Reserved.

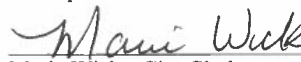
It Is Hereby Resolved by the City Council of the City of East Lansing.

Moved by Council member: Meadows
Supported by Council member: Altmann

ADOPTED: Yeas: 5
Nays: 0
Absent: 0


George Brookover, Mayor
Dated: 3/20/2024

CLERKS CERTIFICATION: I hereby certify that the foregoing is a true and complete copy of an Ordinance amendment that was introduced at the East Lansing City Council meeting held on Tuesday, March 5, 2024, and adopted by the East Lansing City Council at its meeting held on Tuesday, March 19, 2024, the original of which is part of the Council's minutes.


Marie Wicks, City Clerk
City of East Lansing
Ingham and Clinton Counties, Michigan

Approved as to form:

/s/ Anthony Chubb
Anthony Chubb, Esq.
East Lansing City Attorney

7/18/2019
7/23/2019
8/28/2019
9/17/2019
9/30/2019
10/7/2019
10/16/2019
11/11/2019

79-O-19

AN ORDINANCE

**Creating Title 2, Chapter 15 of the Evanston City Code Forming a
“Citizen Police Review Commission”**

**NOW BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF
EVANSTON, COOK COUNTY, ILLINOIS, THAT:**

SECTION 1: Legislative Statement. This Ordinance creates a City of Evanston Citizens Police Review Commission whose primary function is to address issues of complaints filed by citizens against an Evanston Police Officer. Equity and inclusion are core values of the Evanston community. The City Council determines that it is in the best interest of the City to create a Citizen Police Review Commission to increase transparency and build a trusting relationship between the community and the Evanston Police Department.

Article VII, Section (6)a of the Illinois Constitution of 1970, which states that the “powers and functions of home rule units shall be construed liberally,” was written “with the intention that home rule units be given the broadest powers possible” (*Scadron v. City of Des Plaines*, 153 Ill.2d 164). Pursuant to 65 ILCS 5/1-2-1, the City may make all rules and regulations to carry into effect the powers granted to the City, such broad and general grant of authority complementing the City’s home rule powers. At meetings

held in compliance with the provisions of the Illinois Open Meetings Act (5 ILCS 120/1 *et seq.*), the City Council considered this Ordinance, heard public comment, and made findings. It is well-settled law in Illinois that the legislative judgment of the City Council must be considered presumptively valid (*see Glenview State Bank v. Village of Deerfield*, 213 Ill.App.3d 747(1991)) and is not subject to courtroom fact-finding (*see National Paint & Coating Ass'n v. City of Chicago*, 45 F.3d 1124 (1995)).

The City Council finds that creating an entity that proactively addresses issues of citizen complaints against police officers in the City of Evanston is a priority. The City Council desires to amend the City Code to create a Citizen Police Review Commission.

SECTION 2: Title 2, Chapter 15 of the Evanston City Code of 2012, as amended ("City Code"), is hereby created and shall read as follows:

CHAPTER 15 – CITIZENS POLICE REVIEW COMMISSION

2-15-1: PURPOSE.

The Citizen Police Review Commission is established as a subcommittee for the City's Human Services Committee, for the following purposes:

- (A) To promote public confidence in the professionalism and accountability of the City of Evanston's Police Department through unbiased review of the investigation of citizen complaints, thoughtful policy recommendations;
- (B) To add a citizen perspective to the evaluation of citizen complaints;
- (C) To provide a timely, fair and objective review of citizen complaints and the manner which they are investigated; and
- (D) To provide a systematic means to achieve continuous improvement in citizen and police interactions.

2-15-2: MEMBERSHIP; QUALIFICATIONS FOR MEMBERSHIP.

The Commission consists of nine (9) members who serve without compensation and are residents of the City of Evanston. The members must include the following:

- (A) All members must possess a reputation of fairness, integrity and a sense of public service.
- (B) No current elected official, City employee or family member of any City employee may serve on the Commission.
- (C) The appointments shall reflect community diversity, including all nine (9) wards, income levels, ethnicity, age, gender and experience.
- (D) Members must commit to attending meetings regularly and participating in other initiatives of the Commission.

2-15-3: TRAINING AND ORIENTATION.

- (A) The City Manager's Office, in coordination with the Chief of Police, shall develop written standards for orientation, training and continuing education for the Commission members.
- (B) All appointees must complete the initial training and orientation before the first formally convened meeting.
- (C) Training may include police ride-along and firearms simulator training.

2-15-4: TERM.

- (A) Commission members are appointed to three (3) year terms by the Mayor with the advice and consent of the City Council after the initial appointments for staggered terms. No member may serve more than two (2) terms.
- (B) The terms of the initial appointees shall be staggered as follows:
 1. Two (2) persons shall serve a one-year term.
 2. Three (3) persons shall serve a two-year term.
 3. Four (4) persons shall serve a three year term.

2-15-5: POWERS AND DUTIES.

- (A) The purpose of the Commission's review shall be to determine if the completed internal investigation, prior to any final decision on discipline made by the Chief of Police, is complete, thorough, objective and fair based on:
 1. The thoroughness with which each allegation has been investigated.
 2. The extent to which witnesses and/or persons known to have information, knowledge or evidence pertaining to the allegation(s) were contacted or interviewed.
 3. The manner and tone in which interviews were conducted with the complainant, witnesses, involved officer/employees and other persons having knowledge relating to the allegations.
 4. The process of seeking, collecting and maintaining evidence pertaining to the investigation.
 5. The findings determined by Office of Professional Standards.
- (B) The Commission may review a copy of the citizen complaint, a transcript of any interviews conducted, and the final report prepared by the Office of Professional Standards relating to the investigation provided as follows:

1. The identity of all parties to the Complaint shall remain anonymous, including but not limited to the Complainant and the accused officer/employee.
 2. Access to certain information may be restricted in conformance with applicable laws.
- (C) The Commission may view videos of the incident as necessary in closed session.
 - (D) The Commission shall provide a written report summarizing its findings upon completion of its review of a completed investigation and the Office of Professional Standards findings to the Chief of Police.
 - (E) The Commission will provide an annual overview to the Human Services Committee of complaints reviewed and findings of the Commission.
 - (F) A representative of the Police Department command staff assigned by the Police Chief to the Office of Professional Standards shall be present during the review to answer questions, provide explanations or provide other assistance if needed.
 - (G) Pursuant to the Collective Bargaining Agreement, only the Police Chief and the City Manager are empowered to impose discipline.

2-15-6: RULES; SELECTION OF A CHAIRPERSON.

- (A) The Commission must annually elect a Chairperson from among its members.
- (B) The Commission must adopt rules and regulations necessary to exercise its responsibilities.
- (C) Meetings shall be held in conformance with the Open Meetings Act.
- (D) The Police Chief or the City Attorney may request a suspension of the review if there is a separate criminal investigation underway or if civil action against the City is threatened, underway or pending.

2-15-7: MEMBER RESPONSIBILITY.

- (A) Members shall conduct themselves in a manner that maintains public confidence in the integrity of the Commission.
- (B) Members shall refrain from making any comments outside of the committee meetings regarding any pending complaint or investigation.
- (C) A member shall recuse him or herself from deliberations in which he or she has a personal, professional or conflict of interest of any nature.
- (D) A violation of any of these provisions may be grounds for immediate removal from the Commission by the mayor.

SECTION 3: All ordinances or parts of ordinances in conflict herewith are hereby repealed.

SECTION 4: The City of Evanston Citizen Police Advisory Committee is hereby dissolved effective January 1, 2020.

SECTION 5: This ordinance must be in full force and effect after its passage, approval, and publication in a manner provided by law.

SECTION 6: If any provision of this ordinance or application thereof to any person or circumstance is held unconstitutional or otherwise invalid, such invalidity must not affect other provisions or applications of this ordinance that can be given effect without the invalid application or provision, and each invalid provision or invalid application of this ordinance is severable.

Introduced: _____, 2019

Approved:

Adopted: _____, 2019

_____, 2019

Stephen H. Hagerty, Mayor

Attest:

Approved as to form:

Devon Reid, City Clerk

Michelle L. Masoncup, Corporation
Counsel

ARTICLE VIII. - CITIZENS' POLICE COMPLAINT PROCESS

Sec. 202-801. - Citizens' police complaint office established.

- (a) The citizens' police complaint office is established as part of the office of the mayor. Any complaint of a citizen against an officer of the Indianapolis Metropolitan Police Department (IMPD) alleging that the officer used profane and abusive language or intentionally destroyed or damaged real or personal property, exceeded his/her authority as a police officer, used unauthorized force, or acted in violation of the department's rules and regulations or orders may be filed with the citizens' police complaint office. In addition, if a complainant alleges that intimidation tactics are being used to impede the filing of a complaint, the complainant shall report this to the complaint office and a separate complaint will be filed regarding the new information. Each complaint shall be filed within one hundred eighty (180) days of the action giving rise to the complaint, shall be in writing, and shall be signed by the person making the complaint, who shall affirm under the penalties of perjury that the representations contained therein are true. The complaint may be filed in person or by facsimile or through the mail. Additionally, complaints may be filed after the expiration of the one hundred eighty-day time period where the person making the complaint was under a legal disability during the one hundred eighty-day time period or where, upon a showing of good and sufficient cause and upon majority vote of the citizens' police complaint board, a person is permitted to belatedly file a complaint.
- (b) Any individual personally aggrieved by the act or acts complained of may file a complaint. A parent or guardian may file a complaint on behalf of a minor or incompetent individual. A member of the immediate family of a decedent may file a complaint on behalf of the decedent. The complaint board may, upon two-thirds ($\frac{2}{3}$) vote of its members, initiate an action.
- (c) The complaint process shall be accessible to all citizens regardless of race, national origin, ancestry, religion, color, sex, sexual orientation, gender identity, age, language, disability, or United States military service veteran status.

(G.O. 13, 2016, § 30; G.O. 35, 2020, § 1)

Sec. 202-802. - Citizens' police complaint board established; election process; terms.

- (a) The citizens' police complaint board is established, and shall be composed of nine (9) voting members, two (2) ex-officio, nonvoting police advisory members, and one (1) ex-officio, nonvoting rank-and-file consulting member to be selected as follows:
 - (1) All voting members shall be citizens who are residents of the consolidated city. No sworn law enforcement officer is eligible to serve as a voting member of the board. Voting members may be selected from nominees submitted by the six (6) Indianapolis Metropolitan Police Department district task forces which are convened by the deputy chief of each district. Exception can be that in the event a vacancy is not or cannot be filled in a timely manner per the provisions of this division, the original appointing body may make the appointment using its normal process for making appointments. No district task force may

nominate more than three (3) candidates for appointment to the board. There must be at least one (1) voting member from each Indianapolis Metropolitan Police Department district task force on the citizens' police complaint board, with no more than three (3) from any one (1) district.

- (2) The city county council shall appoint six (6) of the members each having a three-year term or until their successors are appointed and confirmed, but for no longer than sixty (60) days beyond the expiration of their term. No more than four (4) of these six (6) members may be of the same political party.
- (3) The mayor shall appoint three (3) of the members each having a three year term or until their successors are appointed and confirmed, but for no longer than sixty (60) days beyond the expiration of their term.
- (4) Upon the expiration of any voting member's term, an appointment will be made to his position by the original appointing body, for a term of three (3) years. Each member may be reappointed to a three-year term, but may serve no more than two (2) consecutive terms on the board. If a member is unable to complete their term for any reason, the original appointing body shall appoint a new member to complete the term. Such new member shall then be eligible to be reappointed for no more than one (1) additional full consecutive term, if the member has served eighteen (18) months or more of the original term, and no more than two (2) additional full consecutive terms, if the member has served less than eighteen (18) months of the original term.
- (5) The two (2) ex-officio, nonvoting police members of the board shall be appointed as follows: one (1) by the mayor; and, one (1) by the city-county council. Such members shall serve two-year terms ending on December 31 in even-numbered years, and shall:
 - a. Have been members of the Indianapolis Police Department, the county police force of the Marion County Sheriff's Department, the Indianapolis Metropolitan Police Department, or any combination thereof, for more than seven (7) years;
 - b. Have participated in ethics training;
 - c. Have strong community relations experience;
 - d. Be of the rank of sergeant or below in rank, preferably a patrolman; and
 - e. Not serve more than two (2) consecutive terms on the board.
- (6) The one (1) ex-officio, nonvoting rank-and-file consulting member shall be appointed by the president of the Fraternal Order of Police and shall serve a one-year term ending on December 31 of the year of appointment.

(b) All members shall serve at the pleasure of the appointing officials.

(G.O. 13, 2016, § 30)

Sec. 202-803. - Complaint board officers, quorum, attendance, and training.

- (a) The voting members shall select one (1) voting member to serve as president of the complaint board.
- (b) Five (5) voting members of the complaint board shall constitute a quorum for the purpose of conducting business, and five (5) voting members must vote in favor of any item before any action or disposition can be

taken.

- (c) All voting and ex-officio complaint board members must attend a minimum of seventy-five (75) percent of the meetings. The appointing authority shall replace any member who fails to meet this attendance requirement within sixty (60) days of written notice of failure to meet this attendance standard.
- (d) All voting members of the complaint board must participate in twenty (20) hours of training in police procedures, to be completed within six (6) months of their appointment, and shall receive an additional twenty (20) hours of such training per year. In addition, each voting member shall be required to accompany an on-duty officer of the Indianapolis metropolitan police department for a minimum of sixteen (16) hours per year, and for a minimum of four (4) hours per occasion, in order to observe police procedures first-hand. If circumstances render it impossible or impracticable to complete the requirements in this subsection, the chief may approve an alternative training requirement for voting members. Voting members who satisfactorily complete alternative training requirements approved by the chief shall be deemed to have met the requirements under this subsection. The appointing authority shall replace any member who fails to meet these training requirements after written notice to such member of failure to meet these standards.

(G.O. 13, 2016, § 30; G.O. 2, 2021, § 1)

Sec. 202-804. - Complaint board duties.

The citizens' police complaint board shall meet as often as necessary to consider all complaints which it deems appropriate to process and review, but no less than quarterly. The complaint board shall set rules for its governance and shall establish its procedures for processing complaints and for ensuring notification to citizens of the status and disposition of their complaints.

(G.O. 13, 2016, § 30)

Sec. 202-805. - Complaint office director; staff.

- (a) The mayor shall appoint a full-time director of the citizens' police complaint office, subject to approval by the city-county council. The director shall be supervised by and subject to review and evaluation by the mayor or the mayor's designee, with the advice and consent of the members of the citizens' police complaint board. The duties of the director shall include:
 - (1) Managing the citizens' police complaint office, including its staff; and
 - (2) Enhancing communications and good will between the police and the citizenry.
- (b) The director shall have the authority to contract with investigators and legal counsel, if the city corporation counsel is not available, to aid in the investigation of complaints filed with or processed by the office.
- (c) The director shall be in regular communication with the Chief of the Indianapolis Metropolitan Police Department and may make recommendations to the chief concerning matters of conduct and recurring issues that are processed by the citizens' police complaint office. The director shall also provide periodic reports for publication in the department's annual report.

- (d) Staffing and budget recommendations for the citizens' police complaint office shall be made by the director in consultation with the mayor or mayor's designee and the citizens' police complaint board.
- (e) On a quarterly basis, the director shall forward a report of each complaint board member's attendance and each voting member's training, as required by section 202-703, to the member's appointing body, the public safety director, and the Chief of the Indianapolis Metropolitan Police Department.
- (f) The director shall provide a monthly report of citizen complaints against police officers on the city and county website. The report shall include the officers' name and rank, the information listed in section 279-106(1), any findings endorsed by the board pursuant to section 202-806(b), and any dispositions by the board pursuant to section 202-806(d).

(G.O. 13, 2016, § 30; G.O. 35, 2020, § 2)

Sec. 202-806. - Complaint investigation and hearing procedures.

- (a) Upon the filing of a complaint, the director shall immediately send a copy of the complaint to the Chief of the Indianapolis Metropolitan Police Department or the chief's designee. In addition, the officer or officers alleged to be involved in the incident shall be notified of the date of the incident, and given a copy of the complaint. After the filing of a complaint, the complaint board shall table its own investigation for a period of sixty (60) working days to allow the department to conduct its own investigation and to allow the chief to take appropriate action. The chief may request an extension of time to complete the investigation from the director. All complaints shall be referred to IMPD Internal Affairs for investigation. An independent investigator employed by the complaint office shall conduct a concurrent investigation and work in collaboration with Internal Affairs.
- (b) When the investigation is returned to the citizens' police complaint office, the complaint board shall review the investigation conducted by the department and the action taken by the chief, if any. At the public meeting to review the complaint and investigation, the complainant and officer or officers alleged to be involved in the incident will each be given five (5) minutes to address the complaint board. The complaint board may dispose of the complaint by endorsing the findings and action taken by the agency and shall notify the chief of this in writing. If the complaint board does not agree with the action taken by the chief or with the results of the investigation conducted by the agency, the complaint board may, by majority vote:
 - (1) Order the director to conduct an investigation into the allegations of the complaint;
 - (2) Conduct an informal administrative hearing on the complaint; and
 - (3) Order the director to engage in a process of informal mediation to attempt to resolve the complaint.
- (c) If the complaint board determines to hold a hearing, the complaint office shall give written notice to all parties and witnesses at least fifteen (15) days in advance of the scheduled hearing. All testimony at such hearing shall be given under oath and under penalty of perjury.
- (d) Upon the completion of the investigation by the complaint office or after the hearing, the complaint board shall make a disposition regarding the complaint. The disposition shall be one (1) or more of the following:
 - (1) Not sustained (when there is insufficient evidence to prove the allegation(s) made in the complaint by

- clear and convincing evidence);
- (2) Sustained (when there is sufficient evidence to prove the allegation(s) made in the complaint by clear and convincing evidence);
 - (3) Exonerated (when the allegation made in the complaint is false or not factual, or the conduct complained of was lawful and proper); and/or
 - (4) Withdrawn (when the complainant requests that no further action be taken on the case).

The disposition must be made within sixty (60) working days after the agency's investigation is returned to the complaint office or after the conclusion of the investigation conducted by the director pursuant to subsection (a) of this section.

- (e) The findings and disposition of the complaint board shall be communicated to the chief in writing within ten (10) days of the date of the disposition.
- (f) If the chief does not confirm the findings and disposition of the complaint board within thirty (30) days of disposition, or if there is a conflict between the findings and disposition of the complaint board and the findings of the chief, then the complaint board may, upon a majority vote of its members, require mediation between the chief and the director.
- (g) Any disciplinary action taken against an officer due to his or her involvement in an incident which resulted in a complaint being filed with the complaint office shall be communicated to the complaint board for disclosure to the public.

(G.O. 13, 2016, § 30; G.O. 35, 2020, § 3)

Sec. 202-807. - Subpoena powers.

For purposes of conducting an investigation or hearing, the complaint board shall have the power to subpoena witnesses and documents, except those documents relating to ongoing criminal investigations, including such public records as are deemed subject to disclosure under the provisions of IC 5-14-3. The power of the complaint board to issue subpoenas shall be enforceable by the Marion County Circuit or Superior Court.

(G.O. 13, 2016, § 30)

Sec. 202-808. - Access to board by officers; participation of officers.

- (a) Any officer subpoenaed to appear before the complaint board may be represented by an attorney.
- (b) Police officers shall have access to the complaint process to defend their actions, both during the investigatory and hearing processes.
- (c) Police officers shall be required to cooperate with the complaint board as an investigation is conducted, subject to their constitutional rights.

(G.O. 13, 2016, § 30)



City of Madison

City of Madison
Madison, WI 53703
www.cityofmadison.com

Master

File Number: 61593

File ID: 61593

File Type: Ordinance

Status: Passed

Version: 3

Reference:

Controlling Body: COMMON
COUNCIL
EXECUTIVE
COMMITTEE

Lead Referral: COMMON COUNCIL
EXECUTIVE
COMMITTEE

Cost:

File Created Date : 07/29/2020

File Name: Ind Police Monitor & Police Civilian Oversight Board

Final Action: 09/01/2020

Title: SUBSTITUTE - Creating Sections 5.19 and 5.20 of the Madison General Ordinances establishing the Office of the Independent Police Monitor and the Police Civilian Oversight Board. (Note: This substitute clarifies that the Civilian Oversight Board does not have the authority to conduct investigations regarding the conduct of Police Department employees but may conduct formal inquiries to assist it in exercising the powers and duties described in section 5.20(9).)

Notes: 6407create5.19-5.20
MAYOR APPROVAL DATE 9/8/2020

Code Sections:

CC Agenda Date: 09/01/2020

Indexes:

Agenda Number:

Sponsors: Donna V. Moreland, Shiva Bidar and Rebecca Kemble

Effective Date: 09/16/2020

Attachments: Memo re Monitor and Board Ordinances.pdf, 61593 v1.pdf, 61593 v2 Alternate.pdf, 61593 v3 Substitute.pdf, 61593 v4 2nd Alternate.pdf, Henak amdt 61593.pdf, Henak amdt 1 61593.pdf, Henak 2nd amendment 61593.pdf, Baldeh proposed amendment 61593.pdf

Enactment Number: ORD-20-00092

Author: Michael Haas, Marci Paulsen, John Strange

Hearing Date:

Entered by: jphelps@cityofmadison.com

Published Date: 09/15/2020

Approval History

Version	Date	Approver	Action
1		Michael Haas	Approved as to Form
1		Ryan Pennington	Delegate
1		Elizabeth York	Approve
1		Michael Haas	Approved as to Form
1		Elizabeth York	Delegate
1		David Schmiedicke	Approve
1		Michael Haas	Approved as to Form
1		Ryan Pennington	Delegate
1		David Schmiedicke	Approve
1		Michael Haas	Approved as to Form
1		David Schmiedicke	Approve

History of Legislative File

Ver- sion:	Acting Body:	Date:	Action:	Sent To:	Due Date:	Return Date:	Result:
1	Attorney's Office	07/29/2020	Referred for Introduction				
	Notes: Common Council Executive Committee, Finance Committee, Equal Opportunities Commission, Public Safety Review Committee						
1	COMMON COUNCIL	08/04/2020	Refer	COMMON COUNCIL EXECUTIVE COMMITTEE		08/28/2020	Pass
	Additional Referrals to Finance Committee, Equal Opportunities Commission, and Public Safety Review Committee						
1	COMMON COUNCIL EXECUTIVE COMMITTEE	08/04/2020	Referred	FINANCE COMMITTEE		08/10/2020	
	Notes:						
1	COMMON COUNCIL EXECUTIVE COMMITTEE	08/04/2020	Referred	EQUAL OPPORTUNITIES COMMISSION		08/13/2020	
	Notes:						
1	COMMON COUNCIL EXECUTIVE COMMITTEE	08/04/2020	Referred	PUBLIC SAFETY REVIEW COMMITTEE		08/26/2020	
	Notes:						

1	FINANCE COMMITTEE	08/10/2020	Return to Lead with the Recommendation for Approval	COMMON COUNCIL EXECUTIVE COMMITTEE	08/28/2020	Pass
	Notes:					
1	PUBLIC SAFETY REVIEW COMMITTEE	08/12/2020	Refer	PUBLIC SAFETY REVIEW COMMITTEE	08/26/2020	
	Notes:					
1	EQUAL OPPORTUNITIES COMMISSION	08/13/2020	Return to Lead with the Recommendation for Approval	COMMON COUNCIL EXECUTIVE COMMITTEE		Pass
1	PUBLIC SAFETY REVIEW COMMITTEE	08/26/2020	Return to Lead with the Recommendation for Approval	COMMON COUNCIL EXECUTIVE COMMITTEE	08/28/2020	Pass
	Notes: Roll Call Vote: 6:2:1 - Ayes: Albouras, Heck, Konkel, Mitnick, Anglim, Myadze; Noes: Harrington-McKinney, Rickey; Absent: Amoah					
	Absent: 1 Gideon W. Amoah					
	Ayes: 6 Patrick W. Heck; Brenda K. Konkel; Matthew D. Mitnick; Mary T. Anglim; Christian A. Albouras and Charles Myadze					
	Noes: 2 Allen M. Rickey and Barbara Harrington-McKinney					
1	COMMON COUNCIL EXECUTIVE COMMITTEE	08/28/2020	RECOMMEND TO COUNCIL WITH THE FOLLOWING RECOMMENDATION S - REPORT OF OFFICER			Fail
	Notes: Motion to adopt the ordinance FAILED: 3:3:1:2 - Ayes: Abbas, Kemble, Bidar; Noes: Harrington-McKinney, Henak, Skidmore; Absent: Tierney; Non-Voting: Carter					
	Absent: 1 Michael J. Tierney					
	Ayes: 3 Syed Abbas; Rebecca Kemble and Shiva Bidar					
	Noes: 3 Barbara Harrington-McKinney; Paul E. Skidmore and Zachary Henak					
	Non Voting: 1 Sheri Carter					
1	COMMON COUNCIL	09/01/2020	Adopt With Amendment(s)			Fail
	Ayes: 6 Paul E. Skidmore; Zachary Henak; Sheri Carter; Michael J. Tierney; Samba Baldeh and Barbara Harrington-McKinney					
	Noes: 14 Patrick W. Heck; Lindsay Lemmer; Michael E. Verveer; Shiva Bidar; Marsha A. Rummel; Donna V. Moreland; Arvina Martin; Syed Abbas; Tag Evers; Grant Foster; Rebecca Kemble; Keith Furman; Christian A. Albouras and Max Prestigiacomo					
	Non Voting: 1 Satya V. Rhodes-Conway					
1	COMMON COUNCIL	09/01/2020	Adopt the Following Amendment(s)			Fail
	Notes:					
	Ayes: 7 Paul E. Skidmore; Zachary Henak; Syed Abbas; Sheri Carter; Michael J. Tierney; Samba Baldeh and Barbara Harrington-McKinney					

		Noes: 13	Michael E. Verveer; Shiva Bidar; Marsha A. Rummel; Donna V. Moreland; Arvina Martin; Tag Evers; Grant Foster; Rebecca Kemble; Keith Furman; Christian A. Albouras; Max Prestigiacomo; Patrick W. Heck and Lindsay Lemmer	
		Non Voting: 1	Satya V. Rhodes-Conway	
1	COMMON COUNCIL	09/01/2020	Adopt the Following Amendment(s)	Fail
		Ayes: 6	Paul E. Skidmore; Zachary Henak; Syed Abbas; Sheri Carter; Samba Baldeh and Barbara Harrington-McKinney	
		Noes: 14	Michael E. Verveer; Shiva Bidar; Marsha A. Rummel; Donna V. Moreland; Arvina Martin; Tag Evers; Grant Foster; Michael J. Tierney; Rebecca Kemble; Keith Furman; Christian A. Albouras; Max Prestigiacomo; Patrick W. Heck and Lindsay Lemmer	
		Non Voting: 1	Satya V. Rhodes-Conway	
1	COMMON COUNCIL	09/01/2020	Adopt With Amendment(s)	Fail
		Ayes: 4	Zachary Henak; Sheri Carter; Samba Baldeh and Barbara Harrington-McKinney	
		Noes: 16	Michael E. Verveer; Shiva Bidar; Marsha A. Rummel; Donna V. Moreland; Paul E. Skidmore; Arvina Martin; Syed Abbas; Tag Evers; Grant Foster; Michael J. Tierney; Rebecca Kemble; Keith Furman; Christian A. Albouras; Max Prestigiacomo; Patrick W. Heck and Lindsay Lemmer	
		Non Voting: 1	Satya V. Rhodes-Conway	
1	COMMON COUNCIL	09/01/2020	Adopt	Pass
		Ayes: 19	Michael E. Verveer; Shiva Bidar; Marsha A. Rummel; Donna V. Moreland; Paul E. Skidmore; Zachary Henak; Arvina Martin; Syed Abbas; Tag Evers; Sheri Carter; Grant Foster; Michael J. Tierney; Samba Baldeh; Rebecca Kemble; Keith Furman; Christian A. Albouras; Max Prestigiacomo; Patrick W. Heck and Lindsay Lemmer	
		Abstentions: 1	Barbara Harrington-McKinney	
		Non Voting: 1	Satya V. Rhodes-Conway	

Text of Legislative File 61593

Fiscal Note

This ordinance creates the Office of the Independent Monitor and the Police Civilian Oversight Board. Fiscal effects of this ordinance can be found in the companion budget resolution to this ordinance (see Legistar 60617).

Title

SUBSTITUTE - Creating Sections 5.19 and 5.20 of the Madison General Ordinances establishing the Office of the Independent Police Monitor and the Police Civilian Oversight Board. (Note: This substitute clarifies that the Civilian Oversight Board does not have the authority to conduct investigations regarding the conduct of Police Department employees but may conduct formal inquiries to assist it in exercising the powers and duties described in section 5.20(9).)

Body

DRAFTER'S ANALYSIS: This ordinance creates the Office of the Independent Police Monitor, a Compensation Group 21 managerial Independent Police Monitor position, and a 13 (thirteen) member Police Civilian Oversight Board.

The Common Council of the City of Madison do hereby ordain as follows:

1. Section 5.19 entitled "**Office of the Independent Police Monitor**" of the Madison

General Ordinances is created to read as follows:

“5.19 OFFICE OF THE INDEPENDENT POLICE MONITOR.

- (1) Creation and Purpose. There is hereby created the Office of the Independent Police Monitor (“OIM”) for the purpose of providing civilian oversight of the Madison Police Department (“MPD”) and ensuring that the MPD is accountable and responsive to the needs and concerns of all segments of the community, thereby building and strengthening trust in the MPD throughout the community.
- (2) Independent Monitor. The OIM shall be managed and directed by a full-time Independent Monitor (“Monitor”). The Monitor shall be a managerial employee as defined in M.G.O. § 3.54(9), except that the Monitor shall be recruited, hired, and supervised by the Police Civilian Oversight Board (“Board”) as provided in M.G.O. § 5.20. The Monitor is responsible for ensuring that the duties of the OIM are fulfilled in consultation and collaboration with the Board. Subject to available funding, the Monitor shall be responsible for hiring, supervising and managing sufficient professional and support staff to effectively perform the duties of the OIM.
- (3) Minimum Qualifications of the Monitor. The Monitor shall be a person with extensive knowledge of civilian oversight of policing, “best practices” in policing, civil rights, and equity. The Monitor shall have never been employed by the MPD, be an immediate family member of current or former MPD employees, or worked as a law enforcement officer within the State of Wisconsin in the ten (10) years prior to appointment as Monitor. For purposes of this ordinance “immediate family” means an individual’s spouse or designated family or registered domestic partner or an individual’s relative by marriage, lineal descent or adoption.
- (4) Recruitment, Appointment, and Confirmation of the Monitor.
 - (a) Recruitment and Appointment by the Board. The Board shall recruit and appoint the Monitor, with the assistance of the Common Council and Office of Human Resources. In fulfilling its duty to recruit and appoint the Monitor, the Board shall develop an appointment process that includes broad community-based outreach and ensures the selection of an individual who will provide the expertise and independence necessary to carry out the duties of the OIM.
 - (b) Confirmation by the Common Council. The appointment of the Monitor by the Board shall not be effective unless and until confirmed by the Common Council.
- (5) Supervision of the Monitor. The Monitor shall report directly to the Board and the Board’s Executive Subcommittee. While it is intended that the Monitor have significant independence and discretion in conducting the day-to-day activities of the OIM, the Monitor shall act as directed by the Board and the Board’s Executive Committee.
- (6) Independence of the Monitor.
 - (a) Independent from MPD. The OIM shall in all respects remain sufficiently independent from the MPD in order to prevent the OIM and the MPD from becoming so closely aligned that the OIM cannot effectively fulfill its duties. For example, at a minimum, the OIM shall not be physically located in the same office as MPD management, officers, or other personnel.
 - (b) Independent from City Staff and Officials. No City employee or official shall attempt to use their political or administrative position to unduly influence or undermine the independence of the Monitor or any employee of the OIM in the performance of their duties and responsibilities as set forth in this

ordinance.

(7) Powers and Duties of the OIM and Monitor.

(a) Monitor Policy Compliance. The OIM shall actively and on an ongoing basis monitor the MPD's compliance with its own Standard Operating Procedures ("SOPs"), governing laws, and lawful orders from the Common Council, including compliance with or progress toward meeting any recommendations or directives contained in the MPD Policy & Procedure Review Ad Hoc Committee Report (October 18, 2019) and the Independent Police Oversight and Review Report ("OIR") Report, to the extent they are adopted and approved by the Common Council, as well as the MPD's own stated goals and mission statement.

(b) Monitor MPD Programs, Activities, Investigations, and Use-Of-Force Incidents.

1. Monitor Activities and Conduct Independent Investigations. The OIM shall actively monitor MPD audits of MPD programs and activities, police officer use-of-force incidents, and MPD investigations of personnel. While doing so, the Monitor may submit requests to the MPD and the Chief of Police to investigate or further investigate any matter the Monitor is reviewing. The MPD shall respond to the Monitor's request in writing, stating whether it intends to conduct a further investigation and, if not, stating the reasons it is declining to investigate. At any time, the Monitor may choose to undertake their own independent investigation of MPD personnel, including the Chief of Police and all represented and non-represented MPD personnel, in response to external or internally generated complaints of misconduct.
2. Make Recommendations to Chief of Police. Based on its review of MPD programs, activities, investigations, and use-of-force incidents, the OIM may make recommendations to the Chief of Police regarding administrative action, including possible discipline, for such personnel.
3. Make Referrals to the Police and Fire Commission. Based on its review of MPD programs, activities, investigation, and use-of-force incidents, the OIM may refer appropriate cases to the Police and Fire Commission ("PFC") so that PFC members may consider initiating disciplinary action.
4. Appoint Counsel for Aggrieved Individuals. The OIM may appoint counsel to provide representation to aggrieved individuals in presenting and litigating complaints against MPD personnel with the PFC, to the extent the Monitor concludes that those complaints have arguable merit. When appointing attorneys for individuals under this section, the Monitor shall appoint an attorney selected by the individual from a list of attorneys prepared by the Board. The Board shall ensure that attorneys on the list provided to individuals have the experience required to handle cases in front of the PFC and charge a reasonable hourly rate. Attorneys' fees paid pursuant to this section shall not exceed fifteen thousand (\$15,000.00) per complaint.
5. Other Monitoring Requested by the Board. The OIM shall monitor any other internal investigation of possible misconduct or undertake an independent investigation of possible misconduct by personnel

when requested to do so by the Board.

- (c) Make Policy Recommendations. The OIM may make recommendations regarding policy issues, and address any other issues of concern to the community, the members of the Board, the Chief of Police, other MPD personnel, the Mayor or the Common Council.
- (d) Assist in Board's Annual Review of the Chief of Police. The OIM shall provide input to the Board for its annual review of the Chief of Police.
- (e) Process Complaints. The OIM shall create and support a process for receiving and investigating complaints from community members about the MPD, the Chief of Police, or any MPD personnel.
- (f) Conduct Community Outreach. The OIM shall engage in community outreach which may include talking with the community about police policies, procedures or training, gathering input from a range of community members and groups, reaching out to special underserved/marginalized communities, and publicizing processes for handling complaints.
- (g) Staff Police Civilian Oversight Board. The OIM shall, in conjunction with the Office of Mayor and Common Council, ensure that the Board has the resources it needs to fulfill its duties, including that the Monitor shall serve as Executive Secretary to the Board.
- (h) Hire OIM Staff and Engage Independent Contractors. The Monitor shall, in collaboration with the Human Resources Department, recruit and hire all staff in the OIM. No employees of the OIM shall have ever been employed by the MPD, be an immediate family member of current or former MPD employees, or worked as a law enforcement officer within the State of Wisconsin in the ten (10) years prior to becoming a staff member of the OIM. For purposes of this ordinance "immediate family" means an individual's spouse or designated family or registered partner or an individual's relative by marriage, lineal descent or adoption. It is anticipated that minimum staffing for the OIM will include the Monitor, an administrative support employee and a data analyst. It is also anticipated that from time-to-time the Monitor may need to engage independent contractors, such as an investigator, to assist in fulfilling the duties of the OIM. In doing so, the Monitor shall follow all City of Madison contracting requirements and ensure that the independent contractor is also not affiliated with MPD or law enforcement as described above for OIM staff.
- (i) Access MPD Records. The OIM shall, to the extent permitted by law, have unfettered access to all MPD records, policies, Standard Operating Procedures, data, computer databases, and other information necessary to fulfill the duties of the OIM.
- (j) Issue Subpoenas. The Monitor may, to the extent permitted by law, issue subpoenas for the purpose of compelling testimony or receiving documents necessary to fulfill the duties of the OIM.
- (k) Develop and Issue Reports and Policy Recommendations. The OIM and Monitor may develop and issue reports and policy recommendations to relevant entities as described above.
- (l) Retain Independent Legal Counsel. The Monitor may retain independent legal counsel if necessary to fulfill the duties of the OIM.
- (m) Issue Public Reports. The OIM shall issue public reports as described in sec. (8) below.

- (8) Public Reporting. One of the key components of the OIM is its duty to develop and

issue independent reports and recommendations to the Police Civilian Oversight Board, Mayor, Common Council, and community. Accordingly, the OIM is authorized to issue the following public reports.

- (a) Annual Public Report. The OIM shall submit an Annual Public Report ("Annual Report") to the Mayor and Common Council by March 15. At a minimum, the Annual Report shall:
 - 1. Set forth the work of the OIM during the prior calendar year;
 - 2. Identify trends regarding complaints, investigations, and discipline of MPD personnel, including, but without identifying specific persons, information regarding personnel who were the subject of multiple complaints, complainants who filed multiple complaints, and issues that were raised by multiple complaints;
 - 3. Make recommendations regarding the sufficiency of investigations and the appropriateness of disciplinary actions, if any, and changes to policies, rules, and training;
 - 4. Provide other pattern and practice analysis as needed; and
 - 5. Assess the MPD's progress in complying with its own SOPs, governing laws, and lawful orders from the Mayor or Common Council, including compliance with or progress toward meeting any recommendations or directives emanating from the work of the Ad Hoc Committee to Review the MPD's Policies and Procedures and the OIR Report, to the extent they are adopted and approved by the Common Council, as well as the MPD's own stated goals and mission statement.
 - (b) Ongoing Public Status Reports. In addition to submitting the annual report, the OIM shall maintain an ongoing status report, which shall be available to the public and which shall include, among other things, patterns relating to complaints and recommendations regarding the sufficiency of investigations, determinations as to whether department rules and policies have been violated, and the appropriateness of disciplinary sanctions, if any.
 - (c) Additional Public Reports. The OIM, as determined within the discretion of the Monitor or as requested by the Board or the Executive Subcommittee of the Board, may publish additional public reports throughout the year about matters within the duties of the OIM.
- (9) Confidentiality. The Monitor, OIM staff and all consultants and experts hired by the Monitor shall treat all documents and information regarding specific investigations or officers as confidential except to the extent needed to carry out their duties.
- (10) Relationship of Monitor and MPD.
- (a) The Monitor, MPD, and Chief of Police shall jointly develop standard operating procedures to govern the relationship and flow of communication between the OIM, Monitor, MPD, and the Chief of Police regarding complaints, investigations, appeals and findings involving MPD and MPD law enforcement officers.
 - (b) The Monitor, MPD, and Chief of Police shall provide each other with notice of complaints, investigations, appeals and findings involving MPD and MPD police officers as soon as possible, including with such information and cooperation as is appropriate and necessary for the receiving party to take meaningful action or conduct a meaningful review of the matter.
 - (c) As provided in sub. (7)(b)1. above, the Monitor may submit requests to MPD and the Chief of Police to investigate or further investigate any matter the

Monitor is reviewing. MPD shall respond to the Monitor's request in writing stating whether it intends to conduct further investigation and, if not, stating the reasons it is declining to conduct further investigations.

- (d) As provided in sub. (7)(i). above, to the extent permitted by law, the Monitor shall have unfettered access to MPD records, policies, Standard Operating Procedures, data, computer databases and other information necessary to fulfill the duties of the OIM, and the MPD and Chief of Police shall ensure the Monitor's requests for such documents are fulfilled as soon as possible."

2. Section 5.20 entitled "**Police Civilian Oversight Board**" of the Madison General Ordinances is created to read as follows:

"5.20 POLICE CIVILIAN OVERSIGHT BOARD.

- (1) Creation. A Police Civilian Oversight Board ("Board") is hereby created for the City of Madison.
- (2) Purpose. The Common Council recognizes that civilian oversight of the Madison Police Department ("MPD") is critical to ensuring that the MPD responds to the needs and concerns of all segments of the community, thereby building and strengthening the community's trust in the MPD's services. The purpose of the Board is therefore to provide within the City of Madison a body that is independent from the MPD, authorized to hire and supervise the Independent Police Monitor ("Monitor"), and required to work collaboratively with the Office of the Independent Police Monitor ("OIM") and the community to review and make recommendations regarding police discipline, use of force, and other policies and activities, including related to rules, hiring, training, community relations, and complaint processes.
- (3) Board Composition.
 - (a) Members.
 1. Number. The Board shall have eleven (11) voting members and two (2) alternate members. Alternate members shall act with full power when any other member of the Board is absent or is unable to act because of a conflict of interest. The second alternate member shall so act only when the first alternate member is absent or unable to act because of a conflict of interest or when two Board members are absent or unable to act because of a conflict of interest. Alternates may not serve on the Board's Executive Subcommittee.
 2. Diverse Composition. 25-40% of the Members shall have lived experience with homelessness, mental health, substance abuse and/or arrest or conviction records. The Board's composition shall be diverse and include:
 - a. At least one member who is:
 - i. African American;
 - ii. Asian;
 - iii. Latinx;
 - iv. Native American; and
 - v. A member of the LGBTQ community.
 - b. At least one member who is affiliated with an organization in the field of:
 - i. Mental Health;
 - ii. Youth Advocacy; and

iii. AODA.

- c. At least one member with an arrest/conviction record.
- d. In constituting the Board as required above, the Mayor and Council shall ensure that members represent a diversity of age, socioeconomic status, gender, geographic residence, and work experience.

Individual members may represent more than one of the categories listed above. For example, one Member can satisfy both requirements that at least one Member is Native American and at least one Member is affiliated with a Youth Advocacy organization.

- 3. Nominated by community-based organizations. The Mayor and Common Council, in collaboration with the Department of Civil Rights, shall seek nominations from a designated set of nine (9) community-based organizations that have an interest in civil rights, immigrant rights, disability rights/mental health, racial equity and social justice, and that also have an interest in the safety of the city and criminal justice reform. Priority shall be given to organizations with budgets under \$1 million. The designated set of organizations shall be initially created in conjunction with the adoption of this ordinance and the Monitor, Board, and Common Council shall ensure that it is updated at least every two (2) years. Each community-based organization shall submit three (3) names to the Mayor and Common Council. The Mayor and Common Council shall appoint one (1) person nominated by each organization.
 - 4. Limited law enforcement experience. No Member shall have ever been employed by the MPD, be an immediate family member of current or former MPD employees, or worked as a law enforcement officer within the State of Wisconsin in the ten (10) years prior to becoming a Member of the Board. For purposes of this ordinance "immediate family" means an individual's spouse or designated family or registered partner or an individual's relative by marriage, lineal descent or adoption.
 - 5. Compensation. Members shall receive a stipend as set by the Common Council for their service to the Board and, if applicable, the Board's Executive Committee, as set and determined by the Common Council.
- (b) Appointment and Residency of Members.
- 1. Appointment.
 - a. Nine (9) Members, one (1) from each community-based organization and who have been selected as outlined in sub. (3)(a)3, shall be appointed by the Mayor and the Common Council and confirmed by the Common Council.
 - b. One (1) Member and one (1) alternate Member shall be appointed by the Mayor and confirmed by the Common Council.
 - c. One (1) Member and one (1) alternate Member shall be appointed and confirmed by the Common Council.
 - 2. Residency of Members. Members shall be residents of the City of Madison at the time of appointment. However, the Common

Council recognizes that some residents may experience high housing mobility and, as a result, may move outside city boundaries during their term for housing or financial reasons. Members who move outside of the City of Madison may remain on the Board for the duration of their term provided that they still reside in Dane County but may not be reappointed if they reside outside the City of Madison.

(c) Terms and vacancies.

1. Terms. Members shall have staggered four-year terms, except that when the Board is initially created and filled, five (5) members shall be appointed for four-year terms, three (3) Members shall be appointed for three-year terms, and five (5) Members, including the two (2) alternate Members, shall be appointed for two-year terms.
2. Vacancies. Any vacancy occurring during the term of any Member shall be filled by the process set forth above. If a Member is appointed to fill an unexpired term, that Member's term shall end at the same time as the term of the person being replaced.

- (4) Member Training and Support. Members shall receive the training necessary to develop expertise in police oversight and community policing, including, at a minimum, training regarding ordinances governing the OIM and Board, a broad range of police practices and procedures, use of force, practices for people in mental health crisis or under the influence of intoxicants, problem-oriented policing, cultural awareness, racial equity, civil rights, the complaint process, investigative procedures, confidentiality requirements, ethics training and public records and public meeting laws. Members shall maintain and further develop their expertise through annual training provided by the City. In addition to training, the City should ensure that socioeconomic status is not a barrier to serving on the Board, by considering providing Members with childcare, reimbursements, and other financial support, and by adjusting Board processes, procedures and meeting times to accommodate a wider variety of life schedules and demands.
- (5) Executive Secretary. The Independent Police Monitor ("Monitor") shall serve as executive secretary of the Board and, in collaboration with the Mayor and Common Council, shall ensure that the Board has the resources necessary to fulfill the duties of the Board. Staff from MPD and the Office of the City Attorney shall attend each Board meeting to answer any questions that may arise. Other City staff shall attend meetings when requested by the Board.
- (6) Executive Subcommittee. The Board shall create a three-member Executive Subcommittee, consisting of the Board Chair and two (2) additional members selected by the Board. Members shall serve two-year terms on the Executive Subcommittee. Members may serve on the Executive Subcommittee for a maximum of two (2) Executive Subcommittee terms. The Executive Subcommittee shall meet at least monthly in order to provide feedback and direction to the Monitor in between Board meetings. At all times, the Executive Subcommittee shall keep the Board informed of the Monitor's work.
- (7) Board Procedures. With the assistance of the OIM, the Board shall create a policy and procedure manual including, but not limited to, information related to the jurisdiction of the Board, relationship of the Board to the OIM, Board Member roles, required training, and special Board rules and procedures, including any authorized exceptions to the procedures contained in M.G.O. § 33.01. In creating those special rules, the Board is strongly encouraged to adopt a rule, notwithstanding M.G.O. § 33.01(9)(e), to allow for free-flowing discussion

between the Board and community during meetings as a way to encourage and ease community input.

- (8) Meetings. The Board shall meet at least quarterly and may meet more frequently as determined necessary by the body to fulfill its duties.
- (9) Powers and Duties. The Board shall have the following powers and duties:
- (a) Appoint and Supervise the Independent Monitor. The Board shall recruit, appoint, and supervise the Independent Police Monitor as provided in M.G.O. § 5.19(4)-(5).
 - (b) Evaluate Effectiveness of the Monitor's Office. The Board shall provide input to the Mayor and Common Council regarding the effectiveness of the Office of the Independent Monitor.
 - (c) Conduct Annual Review of the Chief of Police. With input from the Monitor, the Board shall conduct an annual review of the Chief of Police to assess their performance in office, and submit a report to the Mayor and PFC for completion of the annual performance review of the Chief as recommended by the Ad Hoc Committee Report, including recommendations as to whether the Chief has satisfactorily performed their duties or whether the Chief has failed to perform satisfactorily, thereby constituting grounds for referral to the PFC with a recommendation for dismissal.
 - (d) Conduct Community Outreach. The Board shall engage in community outreach, including holding public hearings to receive community input regarding police policies, procedures, training, and processes for handling complaints. In doing so, the Board should seek to gain input from a range of community members and groups, including underserved/marginalized communities.
 - (e) Make Policy Recommendations. The Board shall make policy-level recommendations regarding discipline, use of force, and other policies, including those related to rules, hiring, training, and community relations, and address any other issues of concern to the community, Board, Monitor, Chief of Police, Mayor, or Common Council.
 - (f) Annual Public Report. The Board shall furnish an Annual Public Report ("Annual Report") to the Mayor and Common Council regarding the Board's assessment of the work of the monitor's office; the Board's activities during the preceding year; concerns expressed by community members; the Board's assessment of the MPD investigative and disciplinary processes; recommendations for ways that MPD can improve its relationships with the community; and recommendations for changes to police department policies, rules, hiring, training, and the complaint process.
 - (g) Issue Subpoenas. The Board may, to the extent permitted by law, issue subpoenas for the purpose of compelling testimony or receiving documents necessary to fulfill the duties of the Board.
- (10) Relationship between the Board and the Police and Fire Commission. The Board's various duties give it the authority to review disciplinary decisions and process, evaluate MPD standard operating procedures, and conduct ~~independent investigations~~ formal public inquiries to fulfill the duties specified in 5.20(9), but does not give the Board the authority to impose discipline, reverse disciplinary decisions, or mandate any other action or decision by the PFC."

**AMENDMENT NO. ONE TO CONTRACT NO. S20178065
BETWEEN THE CITY OF PALO ALTO AND
MICHAEL GENNACO DBA OIR GROUP**

This Amendment No. 1 (this "Amendment") to Contract No. S20178065 (the "Contract" as defined below) is entered into as of this 20th day of July, 2021, by and between the CITY OF PALO ALTO, a California chartered municipal corporation ("CITY"), and MICHAEL GENNACO DBA OIR GROUP, a sole proprietor, located at 7142 Trask Avenue, Playa Del Rey, CALIFORNIA, 90293 ("CONSULTANT"). CITY and CONSULTANT are referred to collectively as the "Parties" in this Amendment.

RECITALS

A. The Contract (as defined below) was entered into by and between the Parties hereto for the provision of professional services, as detailed therein.

B. The Parties now wish to amend the Contract in order to add additional scope and increase compensation.

NOW, THEREFORE, in consideration of the covenants, terms, conditions, and provisions of this Amendment, the Parties agree:

SECTION 1. Definitions. The following definitions shall apply to this Amendment:

- a. **Contract.** The term "Contract" shall mean Contract No. S20178065 between CONSULTANT and CITY, dated December 16, 2019.
- b. **Other Terms.** Capitalized terms used and not defined in this Amendment shall have the meanings assigned to such terms in the Contract.

SECTION 2. Section 1 of the Contract is hereby amended to read as follows:

SECTION 1. SCOPE OF SERVICES. CONSULTANT shall perform the Services described at Exhibit "A" in accordance with the terms and conditions contained in this Agreement. The performance of all Services shall be to the reasonable satisfaction of CITY.

☐

Optional On-Call Provision (This provision only applies if checked and only applies to on-call agreements.)

On-Call Services will be authorized by CITY, as needed, with a Task Order assigned and approved by CITY's Project Manager, as identified in Section 13 ("Project Management"). Each Task Order shall be in substantially the same form as Exhibit A-1 ("Professional Services Task Order"). Each Task Order shall contain a specific proposed scope of services, schedule of performance and compensation amount, in accordance with the provisions of this Agreement. To accept a Task Order, CONSULTANT shall sign the Task Order and return it to the Project Manager within the time specified by the Project Manager, and upon acceptance by CITY, the signed Task Order shall become part of this Agreement. The cumulative total compensation due to CONSULTANT for all Task Orders issued under this Agreement shall not exceed the amount of Compensation set forth for such services in Section 4 of this Agreement. CONSULTANT shall only be compensated for services performed under an authorized Task Order and CITY may elect to, but is not required to, authorize work up to the maximum compensation amount set forth for such services in Section 4. Performance of and payment for any On-Call Services are subject to all requirements and restrictions in this Agreement.



Additional Services (This provision only applies if checked and only applies to Agreements that specify an amount for Additional Services under Section 4 and Exhibit "C".)

Additional Services (as defined in Section 4, "Not to Exceed Compensation") will be authorized by CITY, as needed, with a Task Order assigned and approved by CITY's Project Manager, as identified in Section 13 ("Project Management"). Each Task Order shall be in substantially the same form as Exhibit A-1 ("Professional Services Task Order"). Each Task Order shall contain a specific proposed scope of services, schedule of performance and compensation amount, in accordance with the provisions of this Agreement. To accept a Task Order, CONSULTANT shall sign the Task Order and return it to the Project Manager within the time specified by the Project Manager, and upon acceptance by CITY, the signed Task Order shall become part of this Agreement. The cumulative total compensation to CONSULTANT for all Task Orders issued under this Agreement shall not exceed the amount of compensation set forth for Additional Services in Section 4 of this Agreement. CONSULTANT shall only be compensated for Additional Services performed under an authorized Task Order and CITY may elect to, but is not required to, authorize Additional Services work up to the maximum compensation amount set forth for such services in Section 4. Performance of and payment for any Additional Services are subject to all requirements and restrictions in this Agreement.

SECTION 3. Section 4 of the Contract is hereby amended to read as follows:

SECTION 4. NOT TO EXCEED COMPENSATION. The compensation to be paid to CONSULTANT for performance of the Services described in Exhibit "A" (also referred to herein as the "Basic Services"), and reimbursable expenses (if specified in Exhibit "C"), ("Basic Services"), and reimbursable expenses, shall not exceed Ninety-Seven Thousand Five Hundred Dollars (\$97,500.00). CONSULTANT agrees to complete all Basic Services, including specified reimbursable expenses, within this amount. In the event Additional Services (defined below) are authorized, the total compensation for Basic Services, Additional Services and specified reimbursable expenses shall not exceed One Hundred Seven Thousand Five Hundred Dollars (\$107,500). The applicable rate schedule is set out at Exhibit "C-1", entitled "SCHEDULE OF RATES." Any work performed or expenses incurred for which payment would result in a total exceeding the maximum amounts of compensation set forth herein shall be at no cost to the CITY.

Additional Services, if any, shall be authorized in accordance with and subject to the provisions of Exhibit "C". CONSULTANT shall not receive any compensation for Additional Services performed without the prior written authorization of CITY. Additional Services shall mean any work that is determined by CITY to be necessary for the proper completion of the Project, but which is not included within the Scope of Services described at Exhibit "A".

SECTION 4. The following exhibit(s) to the Contract is/are hereby amended or added, as indicated below, to read as set forth in the attachment(s) to this Amendment, which is/are hereby incorporated in full into this Amendment and into the Contract by this reference:

- a. Exhibit "A" entitled "Scope of Services" - AMENDED, REPLACES PREVIOUS.
- b. Exhibit "B" entitled "Schedule of Performance" - AMENDED, REPLACES PREVIOUS.
- c. Exhibit "C-1" entitled "Schedule of Rates" - AMENDED, REPLACES PREVIOUS.

SECTION 5. Legal Effect. Except as modified by this Amendment, all other provisions of the Contract, including any exhibits thereto, shall remain in full force and effect.


SECTION 6. Incorporation of Recitals. The recitals set forth above are terms of this Amendment and are fully incorporated herein by this reference.

(SIGNATURE BLOCK FOLLOWS ON THE NEXT PAGE.)

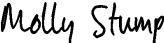
SIGNATURES OF THE PARTIES

IN WITNESS WHEREOF, the Parties have by their duly authorized representatives executed this Amendment effective as of the date first above written.

CITY OF PALO ALTO


DocuSigned by:

513B187C4A90M8
Purchasing Manager

APPROVED AS TO FORM:

DocuSigned by:

39A473B653574A9...
City Attorney

MICHAEL GENNACO DBA OIR GROUP

Officer 1

By: 
7638127E4C424D0...

Name: Michael Gennaco

Title: Principal, OIR Group

Officer 2 (Required for Corp. or LLC)

By:

Name:

Title:

Attachments:

Exhibit "A" entitled "Scope of Services"
Exhibit "B" entitled "Schedule of Performance"
Exhibit "C-1" entitled "Schedule of Rates"

EXHIBIT "A"

SCOPE of SERVICES

Independent Police Auditor Services

CONSULTANT shall perform the following services:

1. Complaints by Members of the Public and Internal Affairs Investigations

Intake – The CONSULTANT may receive complaints directly from members of the public. The CONSULTANT will forward a summary of the complaint and contact information for the complainant directly to the Department. If the Department received the complaint directly or initiates an internal investigation regarding sworn personnel, they will notify the CONSULTANT within (3) working days about the nature of the allegation(s). The Department and the CONSULTANT will review each complaint by a member of the public/internal investigation to determine whether a criminal component exists and proceed accordingly. Complaints from members of the public shall include Supervisor Inquiry Investigations, which are minor complaints that are sufficiently investigated and resolved through expedited review (formerly Informal Inquiry Reports).

Internal affairs investigations shall include employee complaints of discrimination, harassment or retaliation against uniformed officers, whether investigated by the Police Department, Human Resources Department, or an outside investigator retained by the City.

Review – The CONSULTANT will review each investigation of a complaint by a member of the public and internal affairs investigation to determine thoroughness, objectivity and appropriateness of disposition.

Follow-up – After reviewing the completed investigations, the CONSULTANT will confer with the Personnel & Training Coordinator to evaluate results and discuss any suggestions for additional follow-up.

2. Taser Deployment and Other Reviews

The Department will promptly notify the CONSULTANT of all administrative use of force reports where a baton, chemical agent, TASER, less-lethal projectile, canine or firearm is used. The Department will also notify CONSULTANT when a firearm is pointed at a subject. In addition, the Department will promptly notify the CONSULTANT of all other cases where a subject's injuries require treatment beyond minor medical care in the field. Once the Department's investigation, analysis or report of such occurrence is completed, the

CONSULTANT will review the investigation for thoroughness, objectivity and appropriateness of disposition. The CONSULTANT will make any recommendations on the investigation and findings. The CONSULTANT may also make recommendations to the Police Chief regarding training and policy modifications.

The CONSULTANT will include a brief summary of CONSULTANT'S review of each such occurrence in their semi- annual report including the findings and any recommendations.

In addition to CONSULTANT's review of specific matters as set forth in paragraphs 1 and 2 above, CONSULTANT's reports shall include a statistical breakdown of the number of complaints/investigations and any developing trends.

3. Timing, Review and Publication of Reports

Department and CONSULTANT acknowledge that accountability and public trust are served by prompt, accurate and thorough Departmental investigations and CONSULTANT reviews. Department and CONSULTANT also acknowledge that the time required for investigation and review varies depending on the facts and circumstances, including availability of witnesses, investigative resources, complexity, and the existence of collateral proceedings. Department and CONSULTANT commit to use diligence and reasonable efforts to complete investigations, reviews and public reporting in a timely manner.

CONSULTANT will produce two reports during each year summarizing its findings and reporting on each investigation and disposition. Effective June 1, 2021, CONSULTANT'S reports will be published as a City Council Information Report in February and August, except upon mutual agreement where unusual circumstances require.

By December 1 for the February report, and by June 1 for the August report, CONSULTANT will transmit a Draft Report to the Department containing all matters CONSULTANT has completed since CONSULTANT'S most recent previous report. Matters that are within the report time period but are still under investigation or review shall be listed with a short description. CITY and CONSULTANT will coordinate and use reasonable efforts ensure the Draft is reviewed and finalized for publication in February and August.

CITY reviews are for the purpose of completeness, accuracy, and compliance with law and procedure. CONSULTANT will consider CITY's comments and will confer with CITY and attempt to reach a consensus. CONSULTANT will have final authority over the contents of the Final Report. If substantial issues arise with any matter, CONSULTANT shall consider pulling that matter for further work and publication in a subsequent report.

4. Meetings with the City Council

Beginning in the second half of 2021, CONSULTANT shall meet with the City Council two times per year to discuss trends in criminal justice and policing, policy and training matters, recommendations made by CONSULTANT, and other Council concerns. CONSULTANT'S conferences with Council are not for the purpose of elaborating on published reviews of specific incidents and shall not include discussion of personnel matters prohibited by law. Semi-annual conferences shall be scheduled after publication of the CONSULTANT'S report, according to availability of Council and the CONSULTANT.

Council may request that CONSULTANT conduct additional performance reviews on special topics, in light of best practices in the industry. At Council's request and direction, CONSULTANT shall prepare an estimate of time and cost, subject to approval by the Mayor and City Manager on a Task Order basis and compensated as Additional Services.

5. Compliance with State Law

CONSULTANT will ensure that each and all of CONSULTANT'S reports and public comments comply with the Public Safety Officers Procedural Bill of Rights Act ("POBR"), California Government Code 3300 *et seq.*, and California laws on peace officer personnel records, California Penal Code 832.5 *et seq.*

In furtherance of this obligation, CONSULTANT will ensure that reports and public comments do not contain specific information that would identify the involved officers either internally or externally, including names, specific identifying information, factual details, special assignments, reference to single-position assignments, or other indicators that, by themselves or collectively, are likely to lead to disclosure of an officer's identity.

6. Definitions

Sustained – There is sufficient credible evidence to believe that the subject officer committed the act charged in the allegation and thereby engaged in misconduct.

Not Sustained – The available evidence is insufficient to determine whether the officer did or did not commit misconduct.

Unfounded – There is sufficient credible evidence to believe that the subject officer did not commit the alleged act.

Exonerated – The subject officer was found to have committed the act alleged but the officer's actions were determined to be lawful and proper.

EXHIBIT "B"
SCHEDULE of PERFORMANCE

Consultant shall complete reports for calendar year 2018, and thereafter for 2019 and 2020.

In calendar year 2021, CONSULTANT shall complete two reports, for publication in approximately March and August 2021, containing all matters completed since the last published report.

In calendar year 2022, CONSULTANT shall complete two reports, for publication in approximately February and August 2022, containing all matters completed since the last published report

EXHIBIT "C-1"
SCHEDULE OF RATES

Michael Gennaco, \$215.00 per hour

Stephen Connolly, \$215.00 per hour

Certificate Of Completion

Envelope Id: 3B52BC6186634B1C9C70A5D340B5FE7A

Status: Completed

Subject: Please DocuSign: OIR Contract S20178065 Amendment One (final clean).pdf

Source Envelope:

Document Pages: 10

Signatures: 3

Envelope Originator:

Certificate Pages: 2

Initials: 0

Tricia Hoover

AutoNav: Enabled

250 Hamilton Ave

Envelopeld Stamping: Enabled

Palo Alto , CA 94301

Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Tricia.Hoover@CityofPaloAlto.org

IP Address: 199.33.32.254

Record Tracking

Status: Original

Holder: Tricia Hoover

Location: DocuSign

9/14/2021 3:29:34 PM

Tricia.Hoover@CityofPaloAlto.org

Security Appliance Status: Connected

Pool: StateLocal

Storage Appliance Status: Connected

Pool: City of Palo Alto

Location: DocuSign

Signer Events**Signature****Timestamp**

Michael Gennaco

michael.gennaco@oirgroup.com

Principal, OIR Group

Security Level: Email, Account Authentication
(None)

DocuSigned by:



7638127E4C424D0...

Sent: 9/14/2021 3:32:55 PM

Viewed: 9/14/2021 3:35:52 PM

Signed: 9/14/2021 3:36:13 PM

Signature Adoption: Pre-selected Style

Using IP Address: 104.174.143.23

Electronic Record and Signature Disclosure:

Not Offered via DocuSign

Molly Stump

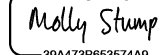
Molly.Stump@cityofpaloalto.org

City Attorney

City of Palo Alto

Security Level: Email, Account Authentication
(None)

DocuSigned by:



39A473B653574A9...

Sent: 9/14/2021 3:36:14 PM

Viewed: 9/14/2021 3:38:09 PM

Signed: 9/30/2021 5:28:05 PM

Signature Adoption: Pre-selected Style

Using IP Address: 199.33.32.254

Electronic Record and Signature Disclosure:

Not Offered via DocuSign

Christine Paras

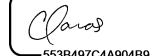
Christine.Paras@CityofPaloAlto.org

Asst. Director Administrative Services

City of Palo Alto

Security Level: Email, Account Authentication
(None)

DocuSigned by:



553B497C4A904B9...

Sent: 9/30/2021 5:28:07 PM

Resent: 10/6/2021 10:55:38 AM

Viewed: 10/6/2021 1:41:38 PM

Signed: 10/6/2021 1:41:48 PM

Signature Adoption: Uploaded Signature Image

Using IP Address: 199.33.32.254

Electronic Record and Signature Disclosure:

Not Offered via DocuSign

In Person Signer Events**Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp**

Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	9/14/2021 3:32:55 PM
Certified Delivered	Security Checked	10/6/2021 1:41:38 PM
Signing Complete	Security Checked	10/6/2021 1:41:48 PM
Completed	Security Checked	10/6/2021 1:41:48 PM
Payment Events	Status	Timestamps

2.30.020 - City attorney—Powers and duties.

- A. As the city's civil legal advisor, the city attorney shall:
1. Attend all meetings of the city council;
 2. Advise the city council and all city officers and employees in all matters of law pertaining to their offices or duties or shall select outside counsel to so advise such persons unless a different selection procedure has been adopted by the city council;
 3. Have charge and control of all outside counsel engaged to advise the city council and any officer or employee in all matters pertaining to their offices or duties, except as otherwise provided by law;
 4. Represent and appear for the city and all city officers and employees and all former city officers or employees in any or all civil actions or proceedings in which the city, or any officer or employee or former officer or employee thereof by reason of an act or omission in the scope of his/her employment is concerned or is a party, or shall select outside counsel to so represent and appear for such persons;
 5. Have charge and control of all civil actions and proceedings in which the city or any officer or employee, or former officer or employee, is concerned or is a party by reason of an act or omission in the scope of his/her employment. The city attorney may commence any action or settle any claim or action of a gross amount of \$50,000 or less, exclusive of court costs; provided, however, that any such commencement of action or settlement in excess of \$25,000 exclusive of court costs, shall be with the approval of the city manager. No action or claim of more than a gross amount of \$50,000, exclusive of court costs, shall be commenced or settled without the prior approval of the city council;
 6. Approve the form of all bonds given to the city and all specifications, requests for proposals and contracts made by the city;
 7. Draft any and all proposed ordinances and resolutions for the city when required by the city council or at the request of the city manager;
 8. Retain and administer the services of an independent police auditor who reports to the city council, with the following duties:
 - a. Serve as a best-practices advisor to the community police oversight commission;
 - b. Have unimpeded access to all police department personnel complaints and investigations thereon, for auditing and reporting purposes, and, upon request and where feasible, be permitted to observe briefings received, interviews conducted, and

- deliberations on personnel matters including, but not limited to, use of force reviews, administrative reviews, and internal affairs reviews;
- c. Review all categorical uses of force by police department personnel to assess whether the police department's investigation into a use of force was complete, thorough, objective, and fair;
 - d. Review investigations of personnel complaints of bias-based policing;
 - e. As directed by or in conjunction with the community police oversight commission, recommend changes and additions to police department policies, procedures, and officer training;
 - f. Issue public reports and give public presentations to the commission regarding police department operations, to the extent permissible under applicable law;
 - g. Perform related duties;
 - h. Notwithstanding the right to observe various stages of personnel matters and to play a role in reviewing and monitoring such matters, refrain from (1) directly or indirectly taking active participation in personnel matters; (2) taking personnel actions; (3) using records developed to take personnel actions; and/or (4) directing that action be taken on police department employees;
 - i. Administer oaths and issue subpoenas for the production of records (in any form, other than personnel records) and attendance and testimony of witnesses (not employed by the city at all relevant times) to carry out the commission's functions, to the extent permitted by law and following the process set forth in Section 2.60.120 of this code, with the city clerk issuing such subpoenas under the seal of the city, and the chief of police causing such subpoenas to be served;
 - j. Comply with all applicable laws, including, but not limited to, Sections 411(B) and 604(J) of the City Charter, and preserve the privacy of police department employees, the confidentiality of their personnel files, the confidentiality of police department files, and the confidentiality of other confidential information to the maximum extent permitted by law; and
9. Perform such other duties relating to the office as shall be required of him/her by law, ordinance, or the city council.
- B. As the city prosecutor, the city attorney shall:
- 1. Prosecute all misdemeanor and infraction offenses committed within the city arising out of

violations of the laws of the state, ordinances of the city and provisions of the Charter of the city which are within the jurisdiction of the municipal court;

2. Handle all appeals arising as a consequence;
3. Draw complaints for such misdemeanors and prosecute all recognizances of bail bond forfeitures arising from or resulting from the commission of such offenses;
4. Perform such other duties relating to such office as shall be required by law, ordinance, or the city council.
5. If there is no qualified or acting city prosecutor or assistant or deputy city prosecutor, an assistant or deputy city attorney shall perform the duties of city prosecutor.

(Ord. 6841 § 2, 2000; Ord. 6637 § 1, 1995; Ord. 6608 § 1 (part), 1994)

(Ord. No. 7368, § 4, 10-5-2020)

ATTACHMENT

City of Santa Rosa Independent Police Department

SCOPE OF WORK

The Scope of Work for the Independent Police Auditor (IPA) includes the following:

1. Review of Santa Rosa Police Department (SRPD) Internal Investigations and Citizen Complaints

a. Administrative Investigations:

i. IPA will review all SRPD administrative investigations (which are conducted by the Professional Standards team), including those involving allegations of police officers use of excessive or unnecessary force.

ii. IPA's review of these investigations will include a determination of whether the investigation was complete, thorough, objective, fair, consistent with contemporary legal standards and whether IPA agreed with the decision of whether there was just cause for discipline and the amount of discipline imposed.

iii. IPA may attend administrative investigation interviews of any witness or subject officer. IPA may ask questions during the interviews in a manner that will not disrupt the interview or violate the Public Safety Officers Procedural Bill of Rights.

iv. IPA shall make a request, in writing, to the Police Chief or Designee for further investigation whenever IPA concludes that further investigation is warranted. If IPA does not receive a satisfactory written response from the Police Chief, IPA shall make a request in writing to the City Manager for further investigation.

b. Officer-Involved Shootings - IPA will review each SRPD investigation of any officer-involved shooting (regardless of whether a person was hit by gunfire), to determine if the investigation was complete, thorough, objective, and fair.

c. Citizen Complaints – IPA may recommend to City Manager or Police Chief that an independent investigation be conducted of a citizen complaint involving allegations of excessive force, violation of civil rights, or other wrongful conduct. IPA may interview any civilian witnesses or complainants in the course any investigation into any citizen complaint.

d. Access to Information - IPA will have full access to all of the same information that the Department Professional Standards Team has in connection with any investigation within the scope of this Agreement.

e. Evaluations by IPA:

- i. With respect to each investigation conducted, IPA will provide a written evaluation as to whether the investigation was complete, thorough, objective, fair and consistent with contemporary legal standards, and/or an explanation of why further investigation or a change in finding is recommended.
- ii. IPA will document any recommendations on policy, procedures, or training growing out of any investigation conducted.

2. Receipt of Citizen Complaints

- a. SRPD shall have a documented process to notify IPA of all citizen complaints received and the assigned investigator.
- b. In order to monitor cases and coordinate interviews as needed, IPA shall receive updates from an SRPD Professional Standards Sergeant regarding all pending cases and investigations.

3. Notice of Death, Serious Injury, or Other Critical Incidents

IPA will receive timely notification of all critical incidents and shall have authority to respond to the scene at IPA's discretion. Such notification shall be provided by an SRPD Professional Standards Sergeant. Critical incidents include:

- a. Officer-involved shootings, regardless of whether a person was hit by gunfire;
- b. A traffic collision involving police officers that results in death or serious bodily injury to another person;
- c. A use of force resulting in death or great bodily injury as defined in California law; and
- d. All deaths while an arrestee/detainee is in the custodial care of SRPD.

4. Audit of SRPD Misconduct Complaints and Discipline Process

- a. IPA will have access to the SRPD complaint database and will regularly assess the nature of complaints, how complaints are classified, whether investigation timelines are met and related issues.
- b. IPA will have access to SRPD personnel and discipline records related to pending cases and will assess the discipline system for fairness and appropriate levels of discipline.
- c. IPA will complete audits on supervisor use of force reviews.

5. Audit of SRPD Policies, Procedures, and Training

The IPA will conduct annual audits of the following:

- a. Progress on meeting SRPD Training Guideline goals - in particular, goals with regards to training on procedural justice, implicit/unconscious bias, de-escalation, systemic racism and other emerging issues.
- b. Progress on SRPD compliance with the California Racial and Identity Profiling Act of 2015 (RIPA) requirements, SRPD stop data, using SRPD data reported under RIPA and other appropriate sources.
- c. SRPD enforcement actions with regards to bias.
- d. Individual use of force investigations, including Taser usage, and use of force aggregate data.
- e. Body camera usage by officers and use of force reviews by supervisors and the Professional Standards Team.
- f. Policies, practices, and procedures related to legal mandates in the area of use of force and equipment.

6. Recommend Changes/Improvements to Policy, Procedure, or Training to ensure the best equitable policing environment

IPA will annually:

- a. Systematically review SRPD existing policies and procedures and evaluate new or changed SRPD policies.
- b. Systematically review SRPD training.
- c. Make written recommendations for improvements or changes to SRPD policy, procedure, or training regarding any matter to the Police Chief.

7. Produce Reports

- a. Annually, IPA shall submit a written report summarizing IPA's evaluations of internal investigations, citizen complaints during that period, and suggestions for improvements to policies, procedures and training, to the City Manager, Police Chief, the City's Public Safety Sub-Committee and/or the City Council. These reports should be made available in Spanish and in English.
- b. Annually, IPA shall give a presentation to the Public Safety Sub-Committee and the City Council, which discusses IPA's evaluations of internal investigations and citizen complaints that occurred during that year and suggest improvements to policies, procedures or trainings. The City will provide translation for any Council or Subcommittee meetings.
- c. All public statements, written reports, documents and materials prepared by, or at the behest of the IPA shall conform to existing law.

8. Conduct Independent Investigations

In cases in which IPA deems an investigation insufficient or the SRPD does not open an investigation, and recommendations for additional investigation are not followed, IPA may, after written notification to and concurrence from the City Manager and the City Attorney, conduct an additional or an independent investigation. SRPD will provide full access to all materials concerning the incident at issue.

9. Community Outreach

IPA will be responsible for meeting with various city and community stakeholders in an effort to seek input on policing issues that may arise. IPA will be available to receive, respond, and assist with complaints from community members. IPA will have a publicly available email address and telephone number where members of the public can reach IPA to address concerns. IPA shall complete ride-alongs with police department staff to increase police department awareness and promote engagement with the community and city staff members.

IPA is responsible for having culturally and linguistically responsive staff to meet the community needs of the City. This includes cultural competence. As much as possible, the IPA staff should reflect the diversity of the City of Santa Rosa.

Community meetings will be facilitated by the Mayor or his/her designee and held twice a year. These meetings will engage and inform residents in the role, work and outcomes of the auditor.

10. Reporting Responsibility

IPA will report directly to the City Manager and will be under the operating authority of the City Manager.

11. In assisting it in carrying out the Scope of Work, IPA will contract with an equity consultant. It is recommended that the consultant understand the micro cultures and communities of this region, and specifically of the City. It is expected that IPA will demonstrate expertise and understanding in the areas of diversity, inclusion, and equity principles as they relate to community development and equitable policing. All public engagement, reports and interaction with the City are expected to reflect this DEI expertise in language and vocabulary, concepts, and recommendations.

Section 125. Police Accountability Board and Director of Police Accountability.

(1) *Establishment and purpose.* A Police Accountability Board is hereby established in the City of Berkeley. The purpose of the Police Accountability Board is to promote public trust through independent, objective, civilian oversight of the Berkeley Police Department, provide community participation in setting and reviewing Police Department policies, practices, and procedures, and to provide a means for prompt, impartial and fair investigation of complaints brought by members of the public against sworn employees of the Berkeley Police Department.

The Office of the Director of Police Accountability is hereby established. The purpose of the Director of Police Accountability is to investigate complaints filed against sworn employees of the Berkeley Police Department, to reach an independent finding as to the facts and recommend corrective action where warranted. The Director of Police Accountability may also serve as the Secretary to the Police Accountability Board and assist the Board in carrying out the duties prescribed herein.

(2) *Definitions.* The following definitions apply to this Article:

- (a) "Commissioners' Manual" refers to the most current manual adopted by the City Council that consists of the policies and procedures regarding the service of board members and commissioners, board and commission procedures, and conduct of meetings.
- (b) "Complainant" shall refer to a member of the public that files a complaint with either the Director of Police Accountability, Police Accountability Board, or the Police Department.
- (c) "Director of Police Accountability" or "DPA" refers to an individual fulfilling the police oversight role established pursuant to section 1 of this Article.
- (d) "Effective Date" shall be the date that the Secretary of State accepts and files this Article.
- (e) "Police Accountability Board" or "Board" refers to the Police Accountability Board established in Section 1 of this Article, which shall be the successor agency to the Berkeley Police Review Commission in accordance with Section 27.
- (f) Except as otherwise specifically provided, all references in this Article to California code sections shall refer to such Code sections as they may be amended or re-codified from time to time.

(3) *Police Accountability Board powers and duties.*

(a) The Police Accountability Board has the following powers and duties:

- (1) To advise and make recommendations to the public, City Council, and City Manager regarding the operation of the Berkeley Police Department, including all written policies, practices, and procedures in relation to the Berkeley Police Department;

- (2) Review and recommend for City Council approval all agreements, letters, memoranda of understanding, or policies which express terms and conditions of mutual aid, information sharing, cooperation and assistance between the Berkeley Police Department and all other local, state and federal law enforcement, intelligence, and military agencies or private security organizations;
 - (3) To receive and consider the findings and recommendations of the Director of Police Accountability regarding complaints filed by members of the public against sworn employees of the Police Department and to recommend if discipline is warranted when misconduct is found and, pursuant to Section 18, the level of discipline for sustained findings of misconduct;
 - (4) To participate in the hiring of the Chief of Police as set forth in Section 22;
 - (5) To access records of City Departments, compel attendance of sworn employees of the Police Department, and exercise the power of subpoena as necessary to carry out its functions;
 - (6) To adopt rules and regulations necessary for the conduct of its business; and
 - (7) Any other powers and duties as the City Council may assign it by Ordinance.
- (b) Nothing in this chapter granting powers and duties to the Police Accountability Board shall limit the City Council's, Chief of Police's or City Manager's authority derived from other provisions of this Charter to act on policing matters, unless explicitly stated.
- (c) The Police Accountability Board, Director of Police Accountability and their respective agents, assigns, employees and representatives shall have no authority to restrict, modify, supersede, negate, supplant or contravene the authority granted to the City Manager and/or Chief of Police by way of the City Charter or operation of state or federal law to engage in collective bargaining activities or enter into agreements or understandings with the designated bargaining unit representative or representatives of the sworn employees of the Police Department unless such agreements or understandings contravene this Article.
- (d) The Police Accountability Board, Director of Police Accountability and their respective agents, assigns, employees and representatives shall not undertake nor sanction any actions which would:
- (1) Restrict, violate, or abridge the collective bargaining rights of the designated bargaining unit representative of the sworn employees of the Police Department or their individual members;
 - (2) Restrict, violate or abridge the terms and conditions of a collective bargaining agreement, understanding or practice with the designated bargaining unit representative of the sworn employees of the Police Department, except for those provisions provided for in this Article; and
 - (3) Restrict, violate or abridge any legal rights of individual sworn employees of the Police Department, including but not limited to those set forth in the Public Safety Officers' Procedural Bill of Rights Act ("POBRA"), Government Code section [3300](#) et seq., and sworn employees' right to maintain the confidentiality of their personnel file information (including, but not limited to Penal Code §§ [832.7](#), [832.8](#)), except as required under Section 20 of Article XVIII of the City Charter.

(4) *Independent agency; budget authority and allocation.*

(a) Notwithstanding Article [VII](#) of the Charter, and except as provided in section 14(b), 14(i) or 14(k), the Police Accountability Board, its staff and the Director of Police Accountability shall be independent of the City Manager.

(b) The Board is authorized to propose a budget to the City Council for its operations, and the City Council may allocate to the Police Accountability Board and Director of Police Accountability, as the City Council determines resources allow, a budget sufficient to provide for a process that protects the rights of complainants and sworn employees of the Police Department, for the Board and its staff to carry out the investigative and policy responsibilities stated herein, and to ensure the independence of the Board.

(5) *Composition of Police Accountability Board; eligibility.*

(a) The Police Accountability Board shall be composed of nine (9) Board members selected by the Mayor and City Council. Each member of the Board must:

(1) Be a resident of the City;

(2) Be at least 18 years old;

(3) Not be an employee, officer, or contractor with the City, a current sworn police officer from any agency, or a current employee, official, or representative of an employee association representing sworn police officers; and

(4) Be fair minded and objective with a demonstrated commitment to community service.

(b) Desirable qualities of a Board member are familiarity with human resources, law, police procedures, police oversight, or involvement in civil rights or community organizations.

(c) All appointees to the Board shall be subject to background checks before final appointment.

(6) *Board member selection.*

(a) Candidates for the Board must complete and file with the City Clerk an application form and an affidavit of residency required by Berkeley Municipal Code Section [2.04.145](#). Board vacancies shall be widely advertised and publicly posted. The Mayor and each City Councilmember shall nominate one candidate from an applicant pool at a meeting of the City Council. Each individual nominee must be approved by a majority vote of the City Council.

(b) The City Council shall endeavor to establish a Board that is broadly inclusive and reflective of race, ethnicity, age, gender identity, sexual orientation, economic status, neighborhoods, and various communities of interest in the City. Toward that end, in soliciting applications for the position of Board member, the Director of Police Accountability shall reach out to civic, community, and civil rights organizations, among others.

(7) *Terms; term limits.*

(a) Board member terms end four years after appointment, or upon the expiration of the nominating City Councilmember's term, whichever is earlier. Board members are limited to serving eight consecutive years and may be reappointed following a break in service of at least two years.

(b) To the extent not in conflict with subsection (a) above, the provisions of Berkeley Municipal Code Section [3.02.040](#), regarding Board member term limits and the effect of interruption in service, apply.

(8) *Conflicts of interest and Avoiding Bias.*

(a) Board members shall be subject to the requirements of the California Political Reform Act and other state and local conflict of interest codes.

(b) Board members shall maintain basic standards of fair play, impartiality, and avoid bias and the appearance of bias. In instances where the Board acts in a quasi-judicial capacity, as in a confidential personnel hearing, as described below, Board members have the responsibility to hear all viewpoints. To ensure that all parties are afforded an opportunity to be heard, Board members shall observe the following:

(1) Board members recused for a conflict of interest must do so immediately when an item is taken up.

(2) Board members shall verbally disclose all ex parte contacts concerning the subject of the hearing. Board members shall also submit a report of such contacts in writing prior to the commencement of the hearing. Ex parte contacts include, but are not limited to, any contact between a Board member and any party involved in the complaint prior to the public hearing.

(3) Board members shall be recused from taking any action on or participating in a matter before the Police Accountability Board if they are related to a party to, advocate for, or represent a member of the public who has a pending or anticipated claim of any kind arising out of alleged misconduct of a sworn employee of the Police Department. For the purpose of this subsection, "related to" shall include a spouse, child, sibling, parent or other person related to the complainant or the complainant's spouse within the third degree of relationship.

(9) *Expiration of term; termination; leaves of absence; removal.*

(a) A Board member whose term has expired may continue to serve until a successor Board member is appointed, unless the sitting Board member's term expires due to term limits, as provided in Section 7.

(b) The term of a Board member who fails to remain eligible to serve on the Board (e.g., by moving out of the City of Berkeley, or becoming an employee of the City) expires automatically as of the date the reason for ineligibility arises.

(c) The provisions of Berkeley Municipal Code Section [3.02.020](#), establishing a termination procedure for absence from meetings, Section [3.02.030](#), leaves of absence, and Section [3.02.035](#), regarding alternate Board members, apply to the Police Accountability Board.

(d) A Board member may either be replaced by the City Council if their term has expired or may be removed during their term as provided in Section 12.

(10) *Board Chairperson and Vice-Chairperson.*

(a) The Board shall elect one of its members as chairperson and one as vice-chairperson, whose terms shall be one year each, or until their successor is elected. No chairperson is eligible to serve more than two consecutive terms, or portions thereof.

(b) Following election of the initial chairperson and vice-chairperson, the Board shall elect subsequent officers each January.

(11) *Board member stipends.*

(a) Each Board member is entitled to receive a stipend of \$100.00 for each regular and special Board meeting attended, and \$20.00 per hour for each hour of training attended as provided in Section 12 and each subcommittee meeting attended as a member of a subcommittee. Excluding participation in trainings, the total stipend paid may not exceed \$300.00 per month per Board member.

(b) Board member stipends and the total monthly stipend paid may be adjusted from time to time by the City Council. Adjustments to Board member stipends shall occur no more than once in a fiscal year and in no event shall an increase in Board member stipends exceed the change in the cost of living for the San Francisco Bay Area as measured by official United States economic reports.

(12) *Board member training; At will Status; Oath of Maintaining Confidentiality.*

(a) The Director of Police Accountability shall establish mandatory training requirements for Board members. Within the first six (6) months of appointment, at a minimum, each Board member shall receive forty (40) hours of training on the following:

- (1) Quasi-judicial duties and obligations of the Board;
- (2) Constitutional rights and civil liberties;
- (3) Fundamentals of procedure, evidence and due process;
- (4) The Public Safety Officers Procedural Bill of Rights Act;
- (5) Police Department operations, policies, practices, and procedures; and
- (6) Duties, responsibilities, procedures and requirements associated with all ranks and assignments.

The Director of Police Accountability shall develop training provided to Board members. The Chief of Police and a representative from the Berkeley Police Association shall have input on training provided to Board members and shall have the opportunity to attend all training provided.

(b) All Board members shall serve at the pleasure of the City Council and may be removed by a two-thirds vote of the City Council for any reason, including but not limited to misconduct or violations of state and federal confidentiality laws.

(c) Board members shall, upon appointment, take an oath to abide by and maintain the confidentiality of the personnel files of sworn employees of the Police Department and all other matters that are confidential pursuant to state and federal law.

(13) *Board meetings; quorum; rules of procedure; subcommittees.*

(a) At the beginning of each calendar year, the Board shall establish a regular meeting schedule consisting of at least eighteen (18) meetings. Special meetings may be called by the chairperson of the Board or by a majority of the Board.

(b) A majority of appointed Board members constitutes a quorum to conduct business and take any action.

(c) The Board shall establish rules of procedure governing the conduct of its business, which shall be subject to ratification by the City Council.

(d) The Board may establish policy subcommittees that it deems necessary to carry out its functions. The Chairperson shall appoint policy subcommittee members at a Board meeting. Policy subcommittees may include non-voting members of the public who express an interest in the business of the subcommittee. Members of the public that are appointed to a policy subcommittee shall serve in an advisory capacity without compensation. The Board may establish further rules and procedures for the appointment and removal of members of the public to policy subcommittees. Policy subcommittee members shall not have access to confidential personnel file information or any other confidential information.

(e) Unless otherwise specified in this Article, rules of procedure governing the conduct of the Board, or Ordinance, the Board shall comply with the Commissioners' Manual.

(14) *Office of the Director of Police Accountability.*

(a) To the extent possible, the City Manager shall recommend three (3) candidates for consideration by the City Council. The City Council shall appoint the Director of Police Accountability at a noticed public meeting.

(b) The Director of Police Accountability shall carry out the work of the Board as described herein, which may include the day-to-day operations of the Board office and staff, and performance appraisals and discipline of all subordinate employees of the Board. All such individuals, to the extent that they are employees of the City of Berkeley, shall be subject to the personnel rules governing City of Berkeley employees.

(c) Within the first six (6) months of appointment, the Director of Police Accountability shall receive training on the following:

- (1) Quasi-judicial duties and obligations of the Board;
- (2) Constitutional rights and civil liberties;
- (3) Fundamentals of procedure, evidence and due process;
- (4) The Public Safety Officers Procedural Bill of Rights;

- (5) Police Department operations, policies, practices, and procedures; and
 - (6) Duties, responsibilities, procedures and requirements associated with all ranks and assignments.
 - (d) By majority vote, the Police Accountability Board may recommend removal for cause of the Director of Police Accountability to the City Council.
 - (e) The City Council may remove the Director of Police Accountability by a two-thirds vote either on its own motion or based on the recommendation of the Police Accountability Board.
 - (f) In addition to the duties prescribed, upon receipt of a complaint by the Police Accountability Board, the Director of Police Accountability shall ensure a timely, thorough, complete, objective and fair investigation into the complaint.
 - (g) The Director of Police Accountability shall assess the conduct of the sworn employee of the Police Department in light of the facts discovered through the investigation, state and federal law, and the policies, practices, procedures, and personnel rules of the City and Berkeley Police Department.
 - (h) The Director of Police Accountability shall present the results of their investigative findings and recommendations to the Police Accountability Board who shall make a recommendation to the Chief of Police regarding the specific complaint.
 - (i) The Director of Police Accountability may hire a Chief Investigator and, when there is a conflict of interest pursuant to Section 15, outside legal counsel, subject to receiving budgetary authority from the City Council.
 - (j) Subject to the budgetary authority of the City Council, the provisions of the City's charter related to personnel, the City's personnel rules, state and federal law, the Director of Police Accountability shall have the authority to hire and dismiss consultants and additional investigators. Subject to City Council approval, the Director of Police Accountability may also enter into contracts for investigative services, provided, however, that with respect to the procurement of supplies and services, the Director of Police Accountability shall comply with the Charter and City purchasing policies and procedures.
 - (k) The powers in this Section 14 are conferred notwithstanding Article VII, Sections [28\(b\)](#) and [\(c\)](#) and Article XVI, Section [119](#) of this Charter.
 - (l) The Board and Director of Police Accountability shall use the City's Human Resources Department for all human resource matters including, but not limited to hiring, performance evaluation, discipline, and removal of employees.
 - (m) The Director of Police Accountability shall meet periodically with stakeholders, including but not limited to employee organizations representing officers, organizations promoting civil rights and liberties, and organizations representing communities of color, and solicit from them input regarding the work of the Police Accountability Board and the Office of the Director of Police Accountability.
- (15) *Legal counsel.*

(a) The Board and the Director of Police Accountability shall use the services of the City Attorney's Office for legal advice.

(b) In the event the City Attorney has a prohibited conflict of interest under the California Rules of Professional Conduct with regard to a specified matter, the City Attorney shall provide the Director of Police Accountability with separate legal counsel. Pursuant to Section 14, when the City Attorney has determined that a conflict of interest exists, the Director of Police Accountability may engage legal counsel other than the City Attorney for legal advice regarding a specific case or matter.

(16) *Board reports.*

(a) All Board reports shall maintain the confidentiality of personnel file information and other confidential information as required by state and federal law.

(b) The Director of Police Accountability shall prepare an annual report to the public, including but not limited to the following:

(1) A description of the Board's activities during the year, including:

(i) A summary of the number, type, and disposition of complaints filed with the Board;

(ii) A summary of the number, type, and disposition of complaints filed with the Police Department by members of the public;

(iii) Policy complaints undertaken; and

(iv) Other such information that the Board or City Council has requested.

(2) The Department's and the Board's processes and procedures for investigating alleged misconduct, and for determining whether or not discipline is warranted and / or the level of discipline, for sustained findings of misconduct.

(3) Training and education, and any early warning system utilized by the Department.

(4) Training and/or policy issues that arise during the investigations of complaints by the Department, Director of Police Accountability, or Police Accountability Board.

(5) Trends and patterns in vehicle and pedestrian stops, citations, arrests, searches and seizures or other patterns by the Berkeley Police Department. Statistical data shall include the demographics of the complainant, reason for the stop, purpose of the stop and disposition, and location of stop, in compliance with policies, practices, and procedures of the City and Police Department, and the Police Department General Order on Fair and Impartial Policing.

(6) Trends and patterns regarding use of force and officer-involved shootings.

(c) This annual report shall be presented to the Board for approval. Upon adoption by the Board, it shall be presented to the Mayor and City Council, City Manager, and the Chief of Police at a City Council meeting, and

shall include, where appropriate, recommendations for changes in the processes and procedures that were reviewed.

(d) Prior to being made available to any member of the public, all Board reports shall be subject to the review of the City Attorney to ensure compliance with all applicable state and federal confidentiality laws.

(17) *Policy review and approval.*

(a) The Chief of Police shall submit all newly adopted Departmental policies and revisions to the Board within thirty (30) days of implementation. The Board may review policies, practices, and procedures of the Police Department in its discretion or at the request of a member of the public, due to a policy complaint, or due to a complaint from a member of the public against an officer.

(b) If the Police Department and the Board are unable to reconcile their differences about a policy within sixty (60) days from the date that the Chief of Police submits a policy to the Director of Police Accountability, the policy shall be sent to the City Manager for a final decision which shall be reported to the City Council. Nothing in this section shall limit the authority of the City Council under this Charter to enact legislation within its Charter authority or direct the City Manager to implement adopted City Council policy.

(18) *Complaints filed with the Director of Police Accountability.*

(a) The Director of Police Accountability and Board shall adopt regulations for handling complaints filed with the Director of Police Accountability by any member of the public alleging misconduct by sworn employees of the Police Department and undertake investigations of complaints as they deem warranted. The regulations shall include the following:

- (1) What constitutes a complaint; and
- (2) A provision for voluntary mediation of complaints in lieu of an investigation.

(b) The Police Accountability Board shall hear and decide findings on allegations of misconduct, at which subject sworn employees of the Police Department must appear to testify and answer questions consistent with their rights pursuant to state and federal law.

(c) In determining whether a sworn employee of the Police Department has committed misconduct, the standard of proof for the Board shall be “preponderance of the evidence”. The investigation and decision on findings shall be fair, unbiased, and evidence based.

(d) The time limit for investigations and notification of discipline shall be two hundred and forty (240) days from the date of the City’s discovery by a person authorized to initiate an investigation of an alleged act, omission, or other misconduct, unless a Government Code section [3304\(d\)](#) exception applies.

(e) Investigation of all complaints filed with the Director of Police Accountability shall begin immediately and proceed as expeditiously as possible. The time limit for completion of an investigation shall be one hundred and twenty (120) days of the City’s discovery by a person authorized to initiate an investigation of an alleged act, omission, or other misconduct, unless a Government Code section [3304\(d\)](#) exception applies.

(f) No City employee, officer, official or member of the Police Accountability Board shall attempt to interfere or undermine the work of the Director of Police Accountability or any employee of the Office of the Director of Police Accountability in the performance of the duties and responsibilities set forth in this Charter or by Ordinance.

(g) Complaints accepted by the Director of Police Accountability shall be sent in hard copy or electronically to the Chief of Police and Police Department Internal Affairs, members of the Police Accountability Board, and to each identified sworn employee of the Police Department against whom the complaint has been filed.

(h) For complaints being investigated by the Police Department, the Director of Police Accountability shall not participate in the Police Department's Board of Review or any subsequent internal process established by the Police Department to review a complaint filed by any member of the public.

(i) Within sixty (60) days of completing the investigation into allegations of misconduct by sworn employees of the Police Department, the Director of Police Accountability shall submit and present investigative findings to the Police Accountability Board and, if warranted, the Board may agree to hold a personnel hearing which shall be confidential. The Director of Police Accountability shall provide the Board with all evidence and documentation obtained or produced during the course of the investigation to enable its review of the complaint. At said meeting, both the sworn employee of the Police Department who is the subject of the investigation and the complainant shall be present to answer questions from Board members, subject to applicable state and federal law. In addition to submitting and presenting investigative findings to the Police Accountability Board in a confidential personnel hearing, the Director of Police Accountability shall include a recommendation of whether disciplinary action is warranted. For only those cases where an allegation of misconduct, if sustained, would involve any of the classes of conduct described in Penal Code [832.7](#), as enacted pursuant to Senate Bill 1421 on January 1, 2019, and any other classes of police conduct added in any subsequent amendment to, or successor provision, the Director of Police Accountability shall recommend the level of discipline, if warranted.

(j) Within fifteen (15) days of the confidential personnel hearing, the Board may affirm, modify or reject the findings and recommendation of the Director of Police Accountability.

(1) Should the Police Accountability Board agree with the findings and recommendation of the Director of Police Accountability, the Director of Police Accountability's findings and recommendations shall be submitted to the Chief of Police.

(2) If the Board modifies or rejects the findings and recommendations of the Director of Police Accountability, it shall issue a written explanation for its decision and shall forward it to the Chief of Police.

(k) Within ten (10) days of receiving the findings and recommendation of the Director of Police Accountability or Police Accountability Board, if the Chief of Police and Director of Police Accountability or Police Accountability Board are in accord, the Chief of Police shall issue a final decision. If the Chief of Police disagrees with the findings and/or recommendation of the Director of Police Accountability or the Police Accountability Board, the Chief of Police shall issue a tentative decision, which shall be forwarded to the

Director of Police Accountability and Police Accountability Board. Within ten (10) days of receipt of that tentative determination, the Director of Police Accountability may request that the Chief of Police submit the decision to the City Manager or City Manager's Designee who shall make the final determination along with a written explanation to the Director of Police Accountability, Police Accountability Board, and Chief of Police within twenty-five (25) days.

(l) In any conflict between the provisions of this Article and the disciplinary appeal process in an applicable collective bargaining agreement, the collective bargaining agreement shall prevail; provided, however, that no City official is authorized to enter into a collective bargaining agreement or an extension of a collective bargaining agreement that contains provisions contrary to this Article after its Effective Date. Except as expressly provided herein, nothing shall limit the authority of the Chief of Police or City Manager to conduct investigations, make findings, and impose discipline or corrective action, or of an arbitrator charged with adjudicating disciplinary appeals, based upon such standards as each may apply consistent with and subject to the Charter, Ordinance, and personnel rules, the collective bargaining agreement, due process requirements, state labor laws, and Police Department policies and procedures.

(m) Except for the time limit set forth in Section 18(d), the timelines set forth in this section are advisory, and may be adjusted by the Director of Police Accountability after consulting with the City Manager and Chief of Police, to ensure that all investigations and notifications are completed in accordance with the limits of Section 18(d). In the event that the timeline set forth in Section 18(e) is extended, it shall not exceed 195 days.

(19) *Review of complaints filed with the Berkeley Police Department.*

(a) The Police Department shall ensure that any member of the public that files a complaint with the Police Department shall be provided written information and instructions on how to file a complaint with the Director of Police Accountability and Board.

(b) For all complaints filed with the Police Department by any member of the public, the time limit for investigations and notification of discipline shall be two hundred and forty (240) days from the date of the City's discovery by a person authorized to initiate an investigation of an alleged act, omission, or other misconduct, unless a Government Code section [3304\(d\)](#) exception applies.

(c) Investigation of all complaints filed with the Police Department shall begin immediately and proceed as expeditiously as possible. The time limit for completion of the initial investigation shall be one hundred and twenty (120) days of the City's discovery by a person authorized to initiate an investigation of an alleged act, omission, or other misconduct, unless a Government Code section [3304\(d\)](#) exception applies.

(d) Upon completion of the Chief of Police's investigation, the Chief of Police shall issue a letter of disposition to the sworn employee of the Police Department. On all complaints initiated by a member of the public, at the conclusion of the Department's internal affairs investigation, the Chief of Police shall also notify the Director of Police Accountability in writing of the disposition. In addition, the Chief of Police shall notify the complainant of the disposition of the complaint in accordance with the Penal Code.

(e) In cases where the finding is "not sustained", "unfounded" or "exonerated", within twenty (20) days after notification to the complainant is mailed or provided by other reasonable means as specified by complainant,

the complainant shall have the option to contest the Chief of Police's determination to the Director of Police Accountability.

(1) If a complainant contests the Chief of Police's determination, the Director of Police Accountability, if appropriate, may request to review all files, transcripts and records related to the complaint. Within fifteen (15) days of either receiving an objection from a complainant or notice from the Chief of Police that a complainant has filed an objection, the Director of Police Accountability may, in the exercise of the Director of Police Accountability's discretion:

(i) Notify the complainant that the objection has been accepted and that the Police Accountability Board will convene to conduct a review based upon the investigative record provided by the Department; or

(ii) Notify the complainant that the objection has been dismissed. If the Director of Police Accountability dismisses an objection filed by a complainant, the Director of Police Accountability must provide written notice to the Board within thirty (30) days following the Director of Police Accountability's notification to complainant that the objection was dismissed.

(f) Within forty five (45) days of when the Director of Police Accountability notifies the complainant that the objection has been accepted, the Board may dismiss the complainant's objection, issue a report agreeing with the Chief of Police's determination or issue a report disagreeing with the Chief of Police's determination if (1) the Department failed to proceed in a manner required by state and federal law, or (2) the Chief of Police's decision is not supported by the evidence in the record.

(g) If the Police Accountability Board disagrees with the Chief of Police's determination, it shall submit its report to the Chief of Police and the City Manager. The Chief of Police may prepare a report for the City Manager within fifteen (15) days of receiving the Police Accountability Board's recommendation addressing any concerns or objections. Within twenty five (25) days of receiving the report from the Chief of Police, the City Manager or City Manager's Designee, considering the reports of both the Board and Chief of Police, shall make a final determination along with a written explanation to the Director of Police Accountability, Police Accountability Board, and Chief of Police.

(h) The Chief of Police's determination shall not become final, and no discipline shall be administered in any case in which the complainant has contested the Chief of Police's determination until the objection is dismissed or otherwise concluded; provided, however, that a final determination in all cases shall be rendered by the Chief of Police or City Manager not later than two hundred and forty days (240) days, unless Government Code section [3304\(d\)](#) exception applies.

(i) Except for the time limit set forth in Sections 19(b) and 19(c), the timelines set forth in this section are advisory, and may be adjusted to ensure that all investigations are completed in accordance with the limits of Section 19(b) and 19(c), and by mutual agreement between the City Manager, Director of Police Accountability, and the Chief of Police, as applicable.

(20) *Access to records of City departments; compelling testimony and attendance.*

(a) Notwithstanding Article VII, Section [28](#) of this Charter, all departments, officers, and employees of the City shall cooperate with and assist the Director of Police Accountability, Police Accountability Board and its staff and, unless prohibited by state or federal law, produce all records and written and unwritten information, documents, materials and evidence the Board or its staff requests for the purpose of carrying out its duties and functions. Unless otherwise required by state and federal law, the records and information include without redaction or limitation:

- (1) Records relevant to Police Department policies, practices, or procedures;
- (2) Personnel and disciplinary records of sworn employees of the Police Department; and
- (3) Police Department investigative records.

Responding departments or employees of the City shall maintain the confidentiality of any records and information provided consistent with state or federal law governing such records or information and comply promptly, but in no event later than ten (10) business days from the date of request, unless additional time is needed to locate or review records. If additional time is needed to comply, the responding departments, officers or employees shall specify how much time up to thirty (30) additional business days is needed and explain the reasons for delay in producing the necessary records and information.

(b) The Director of Police Accountability, Police Accountability Board and its staff, and their agents and representatives shall maintain the confidentiality of any records and information it receives consistent with state or federal law governing such records or information.

(c) The Director of Police Accountability and Police Accountability Board may issue subpoenas to compel the production of books, papers, and documents, and the attendance of persons to take testimony, as needed to carry out its duties and functions. The testimony of any sworn employee of the Police Department is subject to the due process and confidentiality provisions of applicable state and federal law.

(21) *Advice regarding Police Department budget.* The Board is empowered to review and make recommendations to the City Council regarding the Police Department budget. The Chief of Police shall submit a final budget proposal to the Board for review and recommendations, but the Board's failure to complete that review and make recommendations in a timely manner shall not delay the budget process.

(22) *Hiring of Chief of Police.* Notwithstanding Article VII, Section [28](#) of this Charter, upon the notice of vacancy of the position of Chief of Police, the City Manager shall consult with the Police Accountability Board (or subcommittee of the Board) on the job requirements, application process, and evaluation of candidates for the Chief of Police.

(23) *Chief of Police or command staff to attend Board meetings.* To the maximum extent possible, the Chief of Police shall attend at least one regular Board meeting per month, for each month a regular meeting is held and attend a minimum of twelve (12) meetings per year. The Chief of Police shall send a member of the Police Department's command staff to any regular Board meeting that the Chief of Police does not attend.

(24) *Berkeley Police Department written reports to the Board.* The Chief of Police shall submit reports to the Board on such subjects and at such intervals as the Board, in consultation with the Chief of Police, may prescribe. At least one report per year shall provide information on all use of force statistics, and the number of complaints filed with Internal Affairs, the allegations in each complaint, and the disposition of closed complaints, including any discipline imposed.

(25) *Contract negotiations.* The City Manager shall inform the Police Accountability Board of any changes agreed in contract negotiations and adopted by City Council that may directly affect the work, duties, or responsibilities of the Board.

(26) *Commendation program.* The Board shall establish a regular means of recognizing sworn employees of the Police Department for instances of outstanding service to members of the public, the community at large, or the Department.

(27) *Transition from Police Review Commission to Police Accountability Board.*

(a) The Police Review Commission established by Ordinance No. 4,644-N.S., as amended, shall continue in existence until its functions are transferred to the Police Accountability Board, but no later than January 3, 2022.

(b) To assist in an orderly transition between the Police Review Commission and the Police Accountability Board established by this Article, Police Review Commission staff shall serve as interim Police Accountability Board staff until the City hires a Director of Police Accountability.

(c) The Police Review Commission staff shall transfer all Police Review Commission files, records, books, publications, and documents of whatever kind to, and for the use and benefit of, the newly created Police Accountability Board.

(28) *Review of processes.* The Board shall conduct a review of its processes every two years after the Effective Date in order to ascertain the efficacy of its processes.

(29) *Enabling Legislation.* The Board may make recommendations to the City Council for enacting legislation or regulations that will further the goals and purposes of Article [XVIII](#) of this Charter. The City Council may, based on such recommendations or on its own initiative, enact ordinances that will further the goals and purpose of this Article.

The Board shall have forty-five (45) business days to submit its comments to the City Council, such time to be extended only by agreement of the City Council.

(30) *Repeal of Ordinance No. 4,644-N.S., as amended.* Ordinance No. 4,644-N.S., all amendments thereto, and all rules and regulations promulgated pursuant thereto, shall cease to be operative and are repealed as of the date of the first meeting of the Police Accountability Board established by this Article.

(31) *Severability.* If any word, phrase, sentence, part, section, subsection, or other portion of this Article, or any application thereof to any person or circumstance is declared void, unconstitutional, or invalid for any reason, then such word, phrase, sentence, part, section, subsection, or other portion, or the prescribed application

thereof, shall be severable, and the remaining provisions of this Article, and all applications thereof, not having been declared void, unconstitutional or invalid, shall remain in full force and effect. The People of the City of Berkeley declare that it would have passed this title, and each section, subsection, sentence, clause and phrase of this Article, irrespective of the fact that any one or more sections, subsections, sentences, clauses or phrases is declared invalid or unconstitutional.

The Berkeley Charter is current through November 3, 2020.

Disclaimer: The City Clerk's Office has the official version of the Berkeley Charter. Users should contact the City Clerk's Office for ordinances passed subsequent to the ordinance cited above.

[City Website: www.berkeleyca.gov](http://www.berkeleyca.gov)

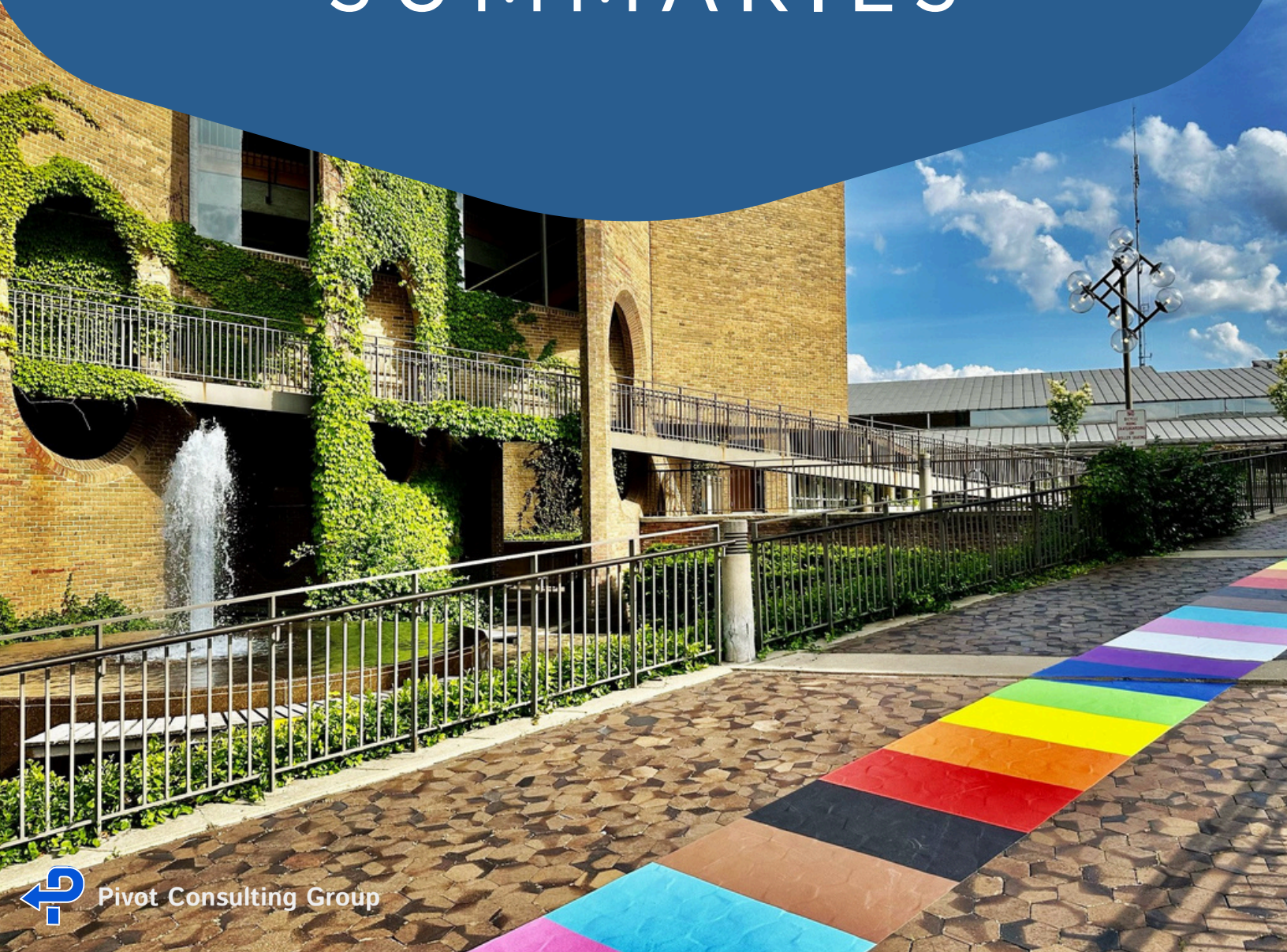
[Hosted by General Code.](#)

Appendix C - Phase 3: Consultation and Collaboration Summaries

VILLAGE OF OAK PARK
CITIZENS POLICE OVERSIGHT RECOMMENDATION

Phase 3

CONSULTATION & COLLABORATION SUMMARIES



Pivot Consulting Group



I. Introduction

Phase 3 marks a transition in the evaluation of Oak Park's Citizen Police Oversight Committee (CPOC), shifting from assessment and research into direct engagement with the stakeholders who shape and are impacted by the oversight process. Having established a foundational understanding of the CPOC's current operations in Phase 1's Needs Assessment and identified effective oversight practices in Phase 2, Pivot Consulting Group (Pivot) conducted Phase 3 during May 2025 to build on these findings through meaningful and inclusive consultation.

Throughout May, Pivot facilitated a series of structured engagement sessions with a broad cross-section of stakeholders, including CPOC members, Oak Park Police Department (OPPD) representatives, Village leadership, staff, and community members. This work was grounded in a commitment to establishing trust, clarifying shared goals, and ensuring that community voices, particularly those from historically marginalized groups disproportionately affected by policing, were centered in the oversight reform process.

The purpose of these consultations was not only to validate the findings from earlier phases, but to surface new insights, tensions, and areas of alignment directly from those involved in or impacted by police oversight. Participants shared candid perspectives on the challenges and opportunities facing CPOC, including the need for clearer mandates, enhanced access to information, formalized feedback loops, improved relationships between stakeholders, and greater public transparency.

These sessions revealed both a deep investment in the success of the CPOC and a shared desire to move beyond the current state of friction between the Committee and the OPPD. While perspectives differed on the scope and nature of civilian oversight, there was widespread agreement that community trust, procedural clarity, and mutual accountability must guide any future model.

Phase 3 represents a bridge between analysis and action. It is the point at which the ideas explored in Phases 1 and 2 meet the lived experience, professional expertise, and institutional knowledge of Oak Park's stakeholders. The feedback gathered during May 2025 now serves as the foundation for the development of targeted, community-informed recommendations in Phase 4. Pivot is grateful to all who participated in this phase for their honesty, engagement, and shared commitment to building a stronger and more accountable public safety system in Oak Park.

II. Methodology

To complete Phase 3 of the CPOC evaluation, Pivot employed a multi-method engagement strategy during May 2025. This approach integrated stakeholder interviews, two distinct survey components, and a public community educational meeting to ensure inclusive, transparent, and comprehensive input. These consultation activities were designed to validate findings from earlier phases, surface new insights, and center both institutional and public voices in the oversight reform process.

A total of seventeen (17) stakeholder interviews were conducted with individuals across key sectors of Oak Park's public safety and governance landscape. The breakdown of interview participants is as follows:

- Six (6) representatives from OPPD, including command-level staff and union leadership. These conversations addressed department practices, internal perceptions of the CPOC, and the current oversight relationship.
- Four (4) members of the Village Board of Trustees, who provided insight into legislative intent, governance priorities, and political considerations regarding oversight reform.
- Three (3) current members of the CPOC, who discussed procedural limitations, resourcing challenges, and their evolving role in public safety oversight.
- Four (4) Village government officials, including an elected official, administrative staff and leadership from departments interfacing regularly with the CPOC. Their input clarified the operational framework, support needs, and data-sharing processes that shape the CPOC's functionality.

All interviews followed a semi-structured format, guided by key themes identified in the Phase 1 Needs Assessment and Phase 2 Effective Practices Research, while allowing flexibility to explore unique stakeholder concerns. Sessions were conducted virtually and in person and were meticulously documented. Themes and insights were synthesized through qualitative coding to identify areas of alignment, tension, and potential reform.

In addition to interviews, Pivot administered two structured survey instruments:

1. Stakeholder survey: Distributed to CPOC members, Village staff, and other individuals closely involved in the oversight process but not interviewed directly. This survey captured additional perspectives on the CPOC's strengths, challenges, and opportunities for improvement, using a mix of Likert-scale and open-ended questions.
2. Community meeting survey: As part of the community educational meeting hosted during Phase 3, Pivot distributed an on-site and online survey to attendees. This survey

was designed to capture public perceptions of oversight legitimacy, trust in the current process, and interest in future engagement. It also invited input on areas of concern and priorities for the CPOC moving forward. Responses were collected anonymously and used to ensure that the voices of Oak Park residents, particularly those less engaged with formal Village processes, were included in shaping recommendations.

The community educational meeting served both as an outreach tool and a platform for public dialogue. Open to all Oak Park residents, the session included a presentation by Pivot on the history and structure of CPOC, findings from earlier phases of this evaluation, and an overview of national oversight practices. The session emphasized accessibility and clarity, ensuring that community members could understand the CPOC's current role and the potential pathways for reform. An open question and answer and comment period allowed residents to voice concerns, raise questions, and share lived experiences. The inclusion of a survey component helped translate these conversations into actionable data.

By combining qualitative interviews, dual-purpose survey instruments, and public engagement, this methodology ensured a robust, multi-perspective foundation for the development of targeted and community-informed recommendations in Phase 4. The insights generated in Phase 3 reflect both institutional realities and community aspirations, providing the essential groundwork for the next phase of Oak Park's oversight reform.

III. Interview Summaries

1. Police

The interviews with OPPD leadership revealed a nuanced and generally constructive perspective on civilian oversight through the CPOC. While participants acknowledged structural and operational limitations in the current oversight model, they also consistently affirmed their support for the principles of transparency, accountability, and community trust. Across all interviews, there was a shared desire to improve relationships, increase clarity, and work collaboratively toward a more functional and sustainable system of oversight. Despite notable areas of tension, leadership expressed an openness to reform and a genuine interest in aligning CPOC's role with Oak Park's values and public safety goals.

A central theme across interviews was the absence of clear structure and defined roles within the CPOC. Leadership described the committee as functioning more like a group of individuals than a unified decision-making body. Concerns were raised about procedural inconsistencies, including ambiguous voting practices, a lack of standardized documentation, and unclear expectations regarding the scope of the committee's authority. This lack of structure has



Phase 3: Consultation and Collaboration

contributed to inefficiencies and misunderstandings and has occasionally led to perceptions of “mission creep,” where individual members pursue requests or investigations beyond the committee’s formal mandate.

That said, participants did not view these limitations as insurmountable. In fact, many emphasized that the CPOC is composed of committed volunteers who are motivated by a sincere desire to serve the community. Police leadership repeatedly acknowledged the integrity and goodwill of many committee members and expressed appreciation for the Village’s proactive effort to evaluate and strengthen the oversight system before a crisis arises. There was broad agreement that the work of oversight is essential, and that CPOC, when equipped with the right tools and structure, can play a vital role in building trust between police and the community.

Communication practices were another area of focus. Interviewees described current interactions as overly formal, indirect, and often hampered by a reliance on third-party communication through the Village liaison. This model, while intended to avoid inappropriate contact, has created inefficiencies and limited opportunities for constructive, real-time dialogue. Participants recommended establishing clearer protocols for submitting and responding to recommendations, ideally through shared documentation systems and agreed-upon timelines. They also suggested periodic joint meetings, informal check-ins, and feedback sessions to improve coordination and reduce miscommunication.

Concerns about data access were also discussed in detail. While police leadership affirmed a strong commitment to transparency, they highlighted operational constraints and legal limits such as privacy protections, union agreements, and aging data systems that complicate or delay responses to some CPOC requests. At the same time, participants expressed a willingness to collaborate on more targeted data-sharing strategies and encouraged CPOC to align its requests with both operational feasibility and the committee’s legal scope. Several leaders acknowledged that frustration over data requests often stems from differing assumptions and lack of shared technical understanding, something that better communication and training could help address.

Culturally, participants were frank about past tensions between the department and CPOC, noting that some interactions had been adversarial or overly politicized. However, they also recognized that those dynamics have improved over time. Many credited individual committee members with making good-faith efforts to learn, adapt, and contribute constructively. Several police leaders described recent engagements as more respectful, better informed, and increasingly focused on shared goals. They emphasized that while disagreements are inevitable



Phase 3: Consultation and Collaboration

in any oversight process, mutual respect, empathy, and professionalism can transform conflict into collaboration.

To that end, interviewees strongly supported the idea of expanded training and orientation for CPOC members. Recommendations included formal onboarding, legal briefings, ride-alongs, and exposure to key departmental procedures. These steps would not only improve the quality of committee deliberations but also foster greater mutual understanding. Participants stressed that oversight bodies must be both independent and informed, capable of engaging with complex legal, operational, and ethical issues without compromising fairness or accuracy.

When asked about the future role of CPOC, most participants supported strengthening the committee's existing review function rather than expanding it into full investigatory or disciplinary authority. They advocated for reforms that would enhance transparency, clarify expectations, and ensure accountability without creating parallel systems that exceed the Village's staffing and financial capacity. Importantly, they emphasized that successful oversight must balance scrutiny with support, serving not only to check police conduct but to reinforce community trust and elevate shared standards of service.

Despite their critiques, all participants expressed optimism about the direction of the evaluation process. They praised the Village's decision to undertake this work deliberately and welcomed the opportunity to contribute their perspectives in a respectful and thoughtful environment. One recurring sentiment was the recognition that both the police department and CPOC are ultimately working toward the same goal: a safer, more equitable Oak Park in which public trust is earned through transparency, professionalism, and shared accountability.

In summary, OPPD leadership conveyed a strong belief that civilian oversight is both necessary and beneficial so long as it is grounded in clear expectations, mutual respect, and realistic capacity. While challenges remain, the interviews revealed a readiness to engage, a desire to improve, and an openness to new models of partnership. With the right investments in structure, communication, and training, participants believed that CPOC could become a more effective and respected pillar of public accountability in Oak Park.

2. CPOC members

The interviews and meeting materials from members of the CPOC provide a vivid and layered account of a committee motivated by a deep sense of civic duty and a strong belief in the importance of accountable, community-centered policing. Members consistently conveyed that they view their role not as oppositional to the OPPD, but as a necessary component of a democratic and transparent public safety system. Across all interviews, members demonstrated



Phase 3: Consultation and Collaboration

commitment to improving oversight structures, increasing their own professionalism, and working toward a culture of shared accountability between the community and the police. At the same time, they expressed clear frustration with operational barriers, institutional silos, and vague authority challenges that they believe limit the committee's potential impact.

One of the most consistently cited concerns was the substantial delay in receiving complaint files for review. Members described this lag, often exceeding a year, as one of the greatest weaknesses of the current oversight process. When complaints are finally brought to the committee, members often find themselves reviewing cases so far removed in time that officer discipline has already been determined, public attention has faded, and complainants may no longer be reachable. This severely limits CPOC's ability to assess whether the process was fair, thorough, or responsive to community concerns. Members emphasized that if their input is to be meaningful, they must be brought into the process earlier, ideally during or immediately after the internal investigation, but before disciplinary decisions are finalized. One member noted that reviewing "cold cases" often feels symbolic, rather than substantive.

This concern is closely connected to the limited and inconsistent access to case materials and departmental data. Members explained that they frequently receive redacted versions of files that omit key information, such as officer names, contextual details, or internal policy references, making it difficult to understand the facts of the case or assess the thoroughness of the investigation. Even in sustained complaints, where findings of officer misconduct are substantiated, the versions provided to CPOC are often sanitized or delayed. In some cases, documents they expected to receive (such as full training logs or supplemental interviews) were simply missing. One member recalled requesting a full dataset on officer training and discovering that key fields such as dates and training hours had been omitted. These gaps have led members to believe that the committee is being kept at arm's length from critical oversight responsibilities. While they acknowledged the need to protect sensitive data, they questioned whether current redaction practices are being applied in good faith or overly broadly.

Despite these challenges, CPOC members expressed pride in the progress the committee has made in recent years toward strengthening its internal structure and practices. While early committee work was described as informal and sometimes inconsistent, members said there has been a growing emphasis on consistency, accountability, and transparency. For example, the committee has placed greater attention on publicizing its meetings, increasing communication with the Village Board, and tracking follow-up from previous discussions. Several members expressed appreciation for the procedural support they've begun to receive from Village staff, such as help preparing agendas, managing logistics, and ensuring that meetings are publicly accessible and compliant with open government laws. These supports have enabled the committee to operate with greater professionalism and credibility—though



Phase 3: Consultation and Collaboration

members believe additional staff capacity would still be needed for the committee to function at its full potential.

A key area of concern and aspiration was CPOC's lack of clearly defined authority, particularly around policy oversight and emerging technologies. Members described the current ordinance as vague, particularly the clause that allows the committee to review "special areas of concern." While they have interpreted this to include new policing technologies such as license plate reader systems (e.g., Flock), surveillance tools, and data management platforms, the lack of formal codification has created repeated conflict with OPPD and Village staff. Members shared examples where they raised questions about new technologies but were told their role did not include policy evaluation. Others reported difficulty obtaining documentation on new systems before those systems were implemented. Participants stated that in a modern policing context, oversight must include not only officer conduct but also institutional systems and policies especially those with civil liberties implications. Members were enthusiastic about the idea of strengthening their advisory role in this area and emphasized that community members have expressed strong support for oversight that extends beyond complaint reviews.

In addition to broadening their authority, members also called for a more proactive and public-facing oversight model. Several suggested that CPOC should publish annual or semi-annual transparency reports summarizing patterns in citizen complaints, commendations, policy changes, and police-community engagement metrics. Others envisioned the committee conducting listening sessions with community groups, attending police trainings, or advising the Village Board on public safety strategy. The goal is not just to monitor complaints, but to foster long-term trust and accountability across all aspects of policing. Members were enthusiastic about building stronger relationships with Oak Park residents and saw public communication as essential to maintaining legitimacy and effectiveness.

Importantly, CPOC members also emphasized their desire to build better relationships with the police department. While they acknowledged that early interactions with OPPD were tense, described by some as "guarded" or "adversarial," they reported improvements in tone and collaboration, particularly under current leadership. Members spoke positively of efforts to increase transparency in policy discussions and noted that individual officers and leaders had been increasingly receptive to dialogue, even when disagreements remained. Several emphasized that oversight is not about "catching" the department doing something wrong but about ensuring that community standards are upheld and systemic learning takes place. They suggested more regular, structured engagement with police leadership such as quarterly meetings, joint retreats, or informal briefings as ways to reduce defensiveness, build rapport, and align on shared goals.



CPOC members also acknowledged internal challenges, including varying levels of experience and preparation among committee members, differing interpretations of the oversight mission, and concern about political dynamics shaping appointments. One member suggested that future appointees be screened for their commitment to objectivity, time availability, and familiarity with complex public service systems. Others emphasized the need for a stronger onboarding process, including training on applicable laws, labor protections, due process rights, and internal OPPD procedures. Several noted that participation in ride-alongs or the Citizen Police Academy would be particularly valuable, both for learning and for signaling to OPPD that CPOC members are committed to fairness and understanding policing from the inside. Despite these challenges, members described a strong team spirit and praised recent colleagues for being engaged, respectful, and mission driven.

Another theme of optimism was the committee's growing interest in developing a formal commendation process. Members believe that a well-designed commendation program would serve multiple goals: publicly recognizing high-quality police work, building goodwill between CPOC and OPPD, and demonstrating the committee's objectivity. Several noted that this idea had already been discussed informally with officers and received positive responses. They envisioned a system where commendations could be tied to exemplary conduct in the field, particularly around de-escalation, respectful engagement, and transparency. This effort, they argued, would help balance the committee's critical review work with a constructive and affirming role.

In summary, CPOC members expressed a clear and ambitious vision for the future of oversight in Oak Park. They want a timely, well-informed, and empowered committee, one that is not only reactive but proactive; not only critical but constructive; not only a watchdog but a bridge between the police and the public. While they were frank about existing limitations, they were equally clear in their belief that the Village has a rare opportunity to build something stronger. With clearer authority, improved access to information, additional structural support, and deeper collaboration with OPPD and Village leadership, CPOC members believe they can help Oak Park become a national model for 21st-century civilian oversight grounded in transparency, accountability, and mutual respect.

3. Board of Trustees

The interviews with members of the Village Board of Trustees revealed a governing body that is not only philosophically aligned with the importance of civilian oversight but also deeply optimistic about its potential to evolve and strengthen local democracy. Trustees demonstrated a nuanced understanding of the challenges currently facing the CPOC, but rather than framing these as failures, they spoke about them as opportunities for constructive reform and



Phase 3: Consultation and Collaboration

institutional growth. Across all interviews, trustees consistently expressed admiration for the volunteers serving on CPOC, appreciation for the Village's proactive evaluation efforts, and a strong desire to see Oak Park become a regional or even national leader in community-centered oversight.

Trustees were unequivocal in their endorsement of police oversight as a necessary, valuable function of local government. Several emphasized that Oak Park's commitment to transparency, accountability, and equity is reflected in the existence of CPOC itself. They described the committee as a unique civic asset that embodies the Village's values and offers residents a direct, meaningful role in shaping public safety practices. One trustee stated, "The existence of CPOC is a strength; it sends a message that we are not afraid of scrutiny, and that we welcome public involvement." Trustees saw CPOC not as an adversarial body, but as a vital accountability partner that, when properly supported, can serve both the public and the police department by identifying areas for improvement and reinforcing trust.

While trustees acknowledged that CPOC has faced internal inconsistencies and procedural ambiguity in the past, they also pointed to clear signs of recent progress. They described how the committee has matured in its operations, improved the tone of its discussions, and become more focused in its deliberations. One trustee noted that "CPOC today is much more organized, professional, and impact-driven than it was even two years ago." Another commented that recent meetings demonstrated a healthy mix of rigor and open-mindedness, suggesting that the committee is finding its footing as a balanced, deliberative body. Trustees also praised the current cohort of CPOC members for their commitment and professionalism, noting that recent appointees brought strong listening skills, a spirit of collaboration, and a genuine desire to serve the community. They emphasized that these members reflect Oak Park's diversity and civic values, and several trustees expressed pride in having appointed such thoughtful and engaged individuals.

Rather than viewing current limitations as reasons to narrow CPOC's mission, trustees were generally enthusiastic about expanding and deepening its role. Multiple trustees expressed interest in broadening CPOC's scope to include forward-looking policy review, data analysis, and technology oversight. One suggested that the committee could become "a research and engagement engine," proactively studying national trends, facilitating public dialogue, and shaping local policing policy. Another envisioned CPOC playing a greater role in restorative justice initiatives, serving as a bridge between law enforcement and communities that may feel marginalized or over-policed. Trustees also saw CPOC as a model for civic learning and leadership development, noting that the committee gives residents hands-on experience with complex governance issues. They praised its potential to "grow future trustees, commissioners,



Phase 3: Consultation and Collaboration

and civic leaders” by engaging citizens in serious, high-stakes deliberation around equity, safety, and public accountability.

Trustees were candid in acknowledging that Village government must do more to support CPOC, particularly in terms of infrastructure, communication, and data access. But this critique was offered with a tone of shared responsibility and a genuine commitment to improvement. One trustee described the evaluation process as “an inflection point”—a rare opportunity to step back and design a more thoughtful, coordinated oversight system. Another trustee said, “We’ve been reactive in the past. Now we have a chance to be proactive.” Several expressed excitement about potential reforms such as a centralized complaint dashboard, structured data-sharing protocols, and regular joint meetings between CPOC, police leadership, and Village staff. Rather than fearing transparency or tension, they welcomed these reforms as necessary steps toward a more functional and trusted system.

Trustees were also hopeful about improving relationships between CPOC and the OPPD. While they acknowledged some early friction, they described recent changes in tone and engagement as encouraging. One trustee commented that “both sides are starting to show up with more curiosity and less defensiveness,” and another noted that recent police leadership had “shown real willingness to engage in dialogue, not just compliance.” There was strong support for building out regular touchpoints such as briefings, shared trainings, and informal working groups to help reduce misunderstandings and foster a culture of mutual respect. Trustees framed this not as a softening of oversight but as a way to make it more durable and effective. One remarked, “If we can build a relationship where oversight is expected, welcomed, and normalized, that’s a win for everyone.”

Several trustees reflected candidly on the political polarization surrounding public safety in Oak Park. They described public discourse around policing as ideologically charged, often driven by national narratives rather than local data or experience. One trustee cautioned that strong opinions on both ends of the spectrum can dominate conversations and obscure more nuanced or evidence-based perspectives. In this context, CPOC can sometimes be viewed as partisan, either too pro-police or too critical, depending on the observer. Trustees emphasized the importance of maintaining ideological balance within the committee and suggested that member recruitment and appointment processes should emphasize objectivity, diverse lived experiences, and a commitment to civil dialogue. One trustee proposed revisiting the appointment process to include more structured vetting or standardized criteria to ensure that appointees are prepared for the demands of oversight.

Trustees expressed serious concern about the Village’s current data infrastructure especially in relation to public safety. They noted that the police department’s records management and

complaint tracking systems are outdated, heavily reliant on manual entry, and not well-integrated with oversight processes. This technical debt constrains both the police department's transparency and CPOC's ability to conduct meaningful reviews. One trustee described trying to understand complaint patterns through "a wall of PDFs," while another suggested that delays in complaint review may be as much a technology issue as a policy one. To strengthen oversight and policy-making more broadly, trustees recommended hiring or designating a neutral, internal data analyst who could serve both the Board and CPOC. This position would help translate raw data into meaningful insights, generate public safety dashboards, and support evidence-based decision-making. There was also interest in investing in a new Record Management System (RMS) for the police department and developing a more user-friendly interface for accessing de-identified complaint data.

Despite critiques, trustees uniformly recognized the dedication and value of CPOC members. They praised the time, thoughtfulness, and persistence that committee members have brought to a complex and often thankless task. One trustee remarked that the committee reflects "the best of what Oak Park wants to be," a community willing to hold itself accountable through structured civic participation. They expressed a desire to better support these volunteers through training, institutional clarity, and respectful engagement from all sides.

In summary, trustees described CPOC as a crucial civic institution that reflects Oak Park's highest ideals and future potential. While they recognized clear areas for structural improvement such as codifying procedures, enhancing data access, and clarifying scope. They framed these as solvable challenges within a larger context of promise and momentum. With increased support, clearer authority, and stronger intergovernmental collaboration, trustees believe CPOC can become not just more effective, but truly transformative, serving as a bridge between institutions and residents and helping to ensure that Oak Park's public safety systems remain just, accountable, and community-centered.

4. Village Management, Staff, and other Officials

Interviews with Oak Park's Village management, staff, and other officials revealed a deep and genuine respect for the ideals of accountability, transparency, and community engagement that underlie the CPOC. These officials expressed strong philosophical support for civilian oversight and recognized CPOC as a valuable institution that reflects Oak Park's progressive civic values. While they were candid about the operational, legal, and procedural limitations facing the current model, their tone throughout was constructive, solutions-oriented, and anchored in a desire to help CPOC thrive. Across all conversations, officials conveyed both a commitment to improvement and an appreciation for the work CPOC has already done under challenging circumstances.



Phase 3: Consultation and Collaboration

Village leaders spoke positively about the role CPOC plays in strengthening trust between the public and law enforcement. Several described the committee's existence as a "point of pride" for Oak Park and noted that few municipalities invest in oversight structures with the same degree of intentionality. One official observed that "oversight is part of how Oak Park tells the truth about itself," and emphasized that the committee brings community values into institutional settings that are often difficult for residents to navigate. They saw CPOC as a natural extension of Oak Park's long-standing commitment to equity, social justice, and inclusive governance.

While recognizing this value, staff also noted that CPOC's responsibilities have expanded significantly since the committee's creation. Originally focused on reviewing citizen complaints following internal investigations, CPOC has increasingly engaged in broader policy conversations such as surveillance technologies, transparency practices, and even community engagement strategies. Staff viewed this evolution as a testament to the committee's energy and ambition but emphasized the importance of aligning that ambition with formal structure. Several noted that the enabling ordinance contains vague language particularly around "special areas of concern" which has led to some confusion over the committee's proper scope. Still, they saw this moment as an opportunity, not a problem: "This is a good sign," said a participant. "The fact that the committee is hungry to do more means there's momentum. Now we need to give them the foundation to succeed."

Staff expressed enthusiasm for updating and clarifying the ordinance to better define CPOC's authority, areas of focus, and relationships with Village departments. They emphasized that clearer guidance would benefit not just CPOC, but all stakeholders, by creating more predictable workflows, reducing the potential for conflict, and improving public understanding of what oversight can and cannot do. Importantly, staff did not seek to narrow CPOC's scope, but to make it more coherent and effective. There was strong support for CPOC to continue offering input on public safety technologies, policies with equity implications, and community engagement initiatives, particularly if these efforts were coordinated with department heads and aligned with broader Village goals.

One of the most consistent themes in the interviews was the urgent need to improve data systems and infrastructure. Officials acknowledged that the OPPD's current systems for tracking and analyzing complaints are outdated and overly reliant on manual processes. This, they said, has made it difficult to respond to CPOC's well-intentioned requests for trend data, demographic breakdowns, or real-time complaint outcomes. However, staff were not defensive about these limitations; instead, they expressed eagerness to modernize. "The asks from CPOC are fair," one person stated. "We're just not built yet to deliver them quickly or comprehensively; but we want to be." Several officials proposed the addition of a dedicated



Phase 3: Consultation and Collaboration

data analyst role, potentially shared across departments, to support both oversight and broader public safety strategy. Others saw opportunities to collaborate with external partners such as universities or civic technology groups to build data tools that could support CPOC's transparency goals without overwhelming existing staff capacity.

On the issue of complaint review, officials were cautious but principled. They expressed concern about giving CPOC a formal role in accepting complaints directly or participating in pre-disciplinary decision-making citing legal risks, contractual obligations with police unions, and the need to preserve due process for all involved. However, they did not reject the idea of expanding CPOC's access to information or participation in broader system design. Several staff members expressed interest in creating new pathways for the committee to review aggregate trends, comment on disciplinary frameworks, or suggest procedural improvements that could prevent complaints in the first place. One legal official described this as a shift from "case-by-case critique" to "systemic improvement," a model they believed would be both impactful and sustainable.

Officials also addressed issues of confidentiality and information sharing. While they expressed concern about granting CPOC unrestricted access to sensitive personnel files or raw investigative materials, they were clear that these concerns stemmed from legal and ethical obligations and not a desire to withhold information. "We want CPOC to have what it needs to be effective," one administrator said. "But we also have to protect employee privacy and the integrity of disciplinary systems." Rather than rejecting access outright, staff supported the creation of clear, legally sound protocols for document sharing, redaction, and information security. Several emphasized that with proper training and agreements, many of these concerns could be resolved, particularly if the committee focused on patterns and policies rather than individual adjudications.

Despite these challenges, officials spoke with great respect about CPOC members and their work. They described the committee as composed of serious, civically-minded volunteers who are doing their best to navigate a complex and emotionally charged system. One manager shared that "we don't always agree on the how, but there's no question that everyone's working in good faith." Staff supported expanded onboarding and training for members and saw great value in building deeper relationships between CPOC and Village departments. Several suggested joint learning sessions, shared participation in conferences or trainings, and even informal meet-and-greets as ways to build mutual understanding and reduce tension.

Importantly, staff also recognized CPOC's potential to enhance community engagement beyond complaint review. They saw opportunities for the committee to lead public education efforts, advise on policy implementation, and help translate community concerns into actionable



recommendations. One staff member commented that “CPOC could become a civic switchboard connecting residents, data, and policy in a way that improves trust across the board.” Others proposed that CPOC help shape Village messaging on transparency initiatives or co-host events to demystify policing practices.

In summary, Village management and staff expressed both realism and optimism about CPOC’s present challenges and future potential. They believe in the committee’s mission, admire its members’ commitment, and want to help create the conditions for its long-term success. While they identified clear areas for reform such as ordinance clarification, data infrastructure, and legal safeguards, they approached these issues not as constraints but as steps toward maturity. In their view, CPOC has already demonstrated that oversight can be principled, passionate, and collaborative in Oak Park. With the right investment, structure, and communication, it can grow into a nationally relevant model of 21st-century community oversight.

IV. CPOC Stakeholder Survey Analysis

The CPOC Stakeholder Survey collected responses from 15 individuals, including 11 members of the Oak Park Police Department, three CPOC members, and one Village government official. While the sample size was modest, the respondent group provided meaningful insight from those most directly connected to oversight in practice. Their input offers valuable direction for strengthening and clarifying CPOC’s structure, role, and public engagement moving forward. For a detailed breakdown on the stakeholder survey, please see attachment.

Respondents represented a range of demographic backgrounds. Most were between the ages of 25 and 54, and 80% identified as male. Racial and ethnic diversity was also present, with approximately one-third identifying as White, one-third as Black or African American, and the remainder identifying as Hispanic, Asian, or preferring not to disclose. These varied backgrounds, along with professional experiences from law enforcement and civilian oversight, enriched the perspectives captured.

More than half of respondents (57%) indicated that CPOC’s role and authority are not clearly defined, and 71% rated the committee as “somewhat effective” or “not effective” in improving police accountability. While these responses suggest a desire for more clarity and cohesion in the committee’s structure and processes, many respondents conveyed openness to improvements that would make oversight more understandable, consistent, and effective for all involved.

When asked about preferred oversight models, 36% supported a review model (consistent with CPOC’s current structure), another 36% favored a hybrid model, and 29% preferred an



Phase 3: Consultation and Collaboration

investigative model. While there was limited support for granting CPOC investigatory authority, with 56% opposed. Some respondents expressed openness to investigations conducted by an outside, independent entity rather than committee members or Village staff. This indicates a thoughtful interest in professional and impartial processes when reviewing complaints.

There was stronger consensus around CPOC's ability to shape police policy. A significant 81% of respondents said the committee should be involved in reviewing or recommending police department policies. Half of the group supported the idea that CPOC should provide feedback on complaints after they are reviewed, while the other half felt that feedback should be limited to high-profile cases. Additionally, 50% supported requiring the police department to formally respond to CPOC recommendations, suggesting a desire for mutual accountability and structured engagement.

Most respondents (64%) preferred that CPOC review complaints only after the Police Chief has issued a final disciplinary decision. This reflects comfort with a post-review model that respects existing internal processes while creating space for community oversight. Respondents generally expressed interest in maintaining clear boundaries and ensuring procedural fairness.

In the area of public transparency and outreach, 67% supported requiring CPOC to host regular public listening sessions. There was also strong support for public reporting, with 38% saying it is "very important" and another 46% calling it "somewhat important." Many responses emphasized that while community-facing transparency is important, it must be done thoughtfully to protect privacy and ensure accuracy.

When asked about access to records, 33% supported full access to police documents and body-worn camera footage, while another 33% supported redacted access. These responses suggest a desire for balance—ensuring that oversight is informed, but also respectful of legal protections and confidentiality concerns.

Regarding accessibility, 73% of respondents said that filing a complaint was either accessible or very accessible, though 7% said they did not know how to do so. Most respondents had not attended a CPOC meeting, indicating that greater visibility and public education could help foster more awareness of the committee's work and functions.

Training and preparation emerged as critical themes throughout the survey. A full 87% of respondents rated formal training for CPOC members as "very important." Specific training recommendations included:

- Clear instruction on CPOC's legal authority, limitations, and scope



Phase 3: Consultation and Collaboration

- Training in civil rights law, conflict resolution, and procedural fairness
- An introduction to relevant Illinois statutes, including the Law Enforcement Officer-Worn Body Camera Act and the Uniform Peace Officers' Disciplinary Act
- Orientation to police department policies and complaint processes
- A focus on bias awareness, objectivity, and confidentiality obligations
- Guidance on how to maintain appropriate tone and professionalism during deliberations and hearings

These suggestions point to a shared belief that effective oversight requires preparation, knowledge, and a commitment to fairness for all parties involved. Respondents also emphasized the value of consistency in how the committee handles complaints and communicates decisions.

Regarding compensation, 57% of respondents opposed paying stipends to CPOC members, though others indicated that compensation might be appropriate depending on workload. This view aligns with the committee's voluntary nature but reflects an understanding that responsibilities may evolve over time.

Several areas were identified as opportunities to strengthen CPOC's capacity. These included expanded community outreach (47%), improved access to police data (33%), engagement with expert consultants (20%), and the addition of dedicated staff to support administrative or research needs (27%).

Open-ended responses highlighted both concerns and constructive ideas. Some respondents cautioned against politicization or adversarial dynamics but also emphasized the value of fair, informed oversight that supports continuous improvement. Several recommended improving complaint intake procedures, creating a public-facing dashboard to track cases and trends, and developing clear dismissal criteria for unsupported complaints. There was also recognition that CPOC could contribute positively to public trust and internal morale when its work is well-informed, respectful, and mission driven.

In summary, the survey, which primarily reflected the views of police personnel and current oversight committee members, suggests strong interest in improving the clarity, training, and structure of civilian oversight in Oak Park. While there is limited support for expanding investigatory powers, there is widespread enthusiasm for enhanced policy input, mutual accountability, transparent communication, and better community engagement. These insights offer a grounded and constructive foundation for the next phase of CPOC's development.



V. Community Engagement and Educational Session Summary

The Community Education and Engagement Session was held on May 8, 2025, at the Oak Park Village Hall. Co-organized by the CPOC Chair Kevin Barnhart and Pivot, the event brought together residents, community leaders, oversight practitioners, and Village representatives for an evening of education, dialogue, and participatory engagement. The session was designed to demystify oversight structures, elevate community voices, and gather actionable input to inform the next phase of Oak Park's oversight system evaluation. It also served as an important opportunity to foster transparency, rebuild public trust, and reaffirm the community's collective investment in public safety and accountability.

The session opened with welcoming remarks from CPOC Chair Barnhart who introduced the evening's goals: to build public understanding of CPOC's role, engage in a conversation about national oversight practices, and invite feedback on how CPOC could evolve to better meet community needs. Attendees included current and former CPOC members, residents who had previously submitted complaints, public safety advocates, among others. The atmosphere was respectful and solutions-focused, with participants expressing a mix of support, concern, and curiosity about the future of oversight in Oak Park.

A central feature of the evening was a keynote presentation by Brian Corr, a national leader in police oversight and former NACOLE board president. Brian walked participants through the historical development of civilian oversight in the U.S., beginning with its roots in the post-Reconstruction era and evolving through several "waves" of reform—from early review boards in the 1950s, to hybrid policy models of the 2000s, to the post-2020 landscape focused on equity, data transparency, and community empowerment. Brian emphasized that oversight structures are not "one-size-fits-all," but must be grounded in local context, legal frameworks, and the lived experiences of residents and police alike.

Brian introduced frameworks for understanding effective oversight, including principles of procedural justice, trauma-informed practices, and shared accountability. He noted that trust-building must be embedded in every interaction; between police and the public, between oversight bodies and institutions, and within the community itself. He advocated for CPOC to position itself as a systems-level problem solver rather than just a reviewer of individual complaints. His presentation was praised by attendees, many of whom said it helped clarify the potential and limitations of oversight in ways that were both practical and inspiring.



Phase 3: Consultation and Collaboration

In addition to education, the session emphasized real-time community participation. A live polling exercise using the Mentimeter platform allowed attendees to share anonymous responses via smartphone to a series of questions about their perceptions of CPOC, trust in law enforcement, and ideas for reform. The responses were displayed live on-screen, providing a collective snapshot of community sentiment. When asked what would increase their confidence in oversight, participants cited the need for formalized police responses to CPOC recommendations, more training for CPOC members, greater diversity and racial balance on the committee, and clearer access to investigatory materials, including body camera footage, transcripts, and departmental findings.

A word cloud generated from audience responses showed that residents' top priorities included transparency, accountability, equity, safety, and trust. Participants also identified “lack of enforcement power” as a key limitation of CPOC, along with gaps in public awareness and insufficient authority to shape policy. Several attendees asked whether CPOC had ever issued recommendations and, if so, what follow-up occurred highlighted a broader need for improved communication and reporting mechanisms between the committee, the police department, and the public.

A second interactive survey asked attendees how they would measure success for CPOC in the long term. Responses included objective and consistent case reviews, increased public engagement, less police misconduct, fewer lawsuits against the Village, and improved relationships between officers and the public. Notably, many participants favored a collaborative model of oversight, one that does not demonize the police but works with them to build institutional integrity. Others emphasized the importance of maintaining true independence from law enforcement structures to protect public trust.

Several attendees shared that while they supported oversight in principle, they had not known how to file a complaint or how CPOC operated. Others were surprised to learn that CPOC does not have investigatory power or access to raw complaint materials until after disciplinary action has been taken. These comments reinforced the need for a comprehensive public education campaign and clearer communication about what oversight means in practice.

The event also included distribution of a community stakeholder poll, which expanded on the live feedback and gathered more detailed insights. Early analysis of this poll showed that most respondents supported giving CPOC the ability to provide formal input on complaint outcomes and expected the police department to acknowledge and respond to that input. There was strong support for increased training and structure for CPOC, as well as expanded community representation on the committee.

Phase 3: Consultation and Collaboration

Finally, the session served as a bridge between the evaluation's research phase and its upcoming policy development stage. Pivot facilitators closed the event by outlining the goals of Phase 4: synthesizing feedback into draft reforms, developing best-practice guidance, and facilitating a shared vision for oversight that reflects Oak Park's unique needs and values. Participants were invited to remain involved, submit additional feedback, and serve as ambassadors for inclusive, principled oversight.

In sum, the May 2025 community education and engagement session was a meaningful gathering for Oak Park. It blended national expertise with local insight, surfaced strong community values, and created an inclusive space for reflection and co-design. The session demonstrated not only the depth of public interest in oversight but also the potential for Oak Park to lead in building a thoughtful, principled, and modern model of civilian-police relations grounded in trust, transparency, and shared responsibility.

The community responses to the in-person polling follow. As they are taken directly from the Mentimeter documentation which were typed in by attendees with their cell phones, there are some mis-spellings in the following images:

What are your top concerns about policing in Oak Park?





What would make you feel more confident in police oversight?



How would you measure the success of CPOC?





Phase 3: Consultation and Collaboration

Any other feedback, ideas, or experiences you'd like to share?

Can we adopt a culture of continuous improvement so that suggestions and requests are not viewed as attacks on police? Can we think of enhancing cpoc as the current Chief's legacy vs an attack on her

Review of frivolous complaints to be dismissed quickly

CPOC has been combative and unprofessional with the Chief of Police in the past which is unacceptable. Please do better.

Dismissal of frivolous complaints

Can we recognize that the criminal justice machine is always intertwined in a causal loop diagram with negative health outcomes (and that includes officers) and use that as justification for oversight

I struggle with equating effective oversight with increased legitimacy of oversight in the eyes of the police department. This centers police over community members, who have less power.

Be careful not to over analyze police complaints thus leading to "paralysis by analysis" Be fair accountable, but not crippling.

De-escalation should be practiced more routinely. Fewer officers showing up for basic Robust data collection Responsive to community concerns. Policy adjustments that ensure everyone thrives

Any other feedback, ideas, or experiences you'd like to share?

Can we look at systemic pressures that might cause divergence between the interests of police and the interest of marginalized community members and the interests of dominant culture community members

Interview process for CPOC applicants should consciously seek to identify bias and affiliation with police adverse groups as well as professional background to maximize chance of having objective members

If there were compulsory police service, there is NO WAY the police force would remain as it is bc we would see what the job entails and how people are treated

Even tho I strongly support change, I worry about backlash and retaliation against the current Chief by current and former officers, aka the "good ol boys".

In a facilitated discussion following the polling, participants raised several actionable ideas, including:

- Developing a public-facing complaint dashboard to track trends, outcomes, and timelines
- Hosting quarterly town halls co-led by CPOC and police leadership to increase accountability
- Instituting a formal mechanism for commendations, allowing residents to recognize exceptional officer conduct
- Providing mandatory onboarding and legal training for CPOC members to improve readiness and consistency

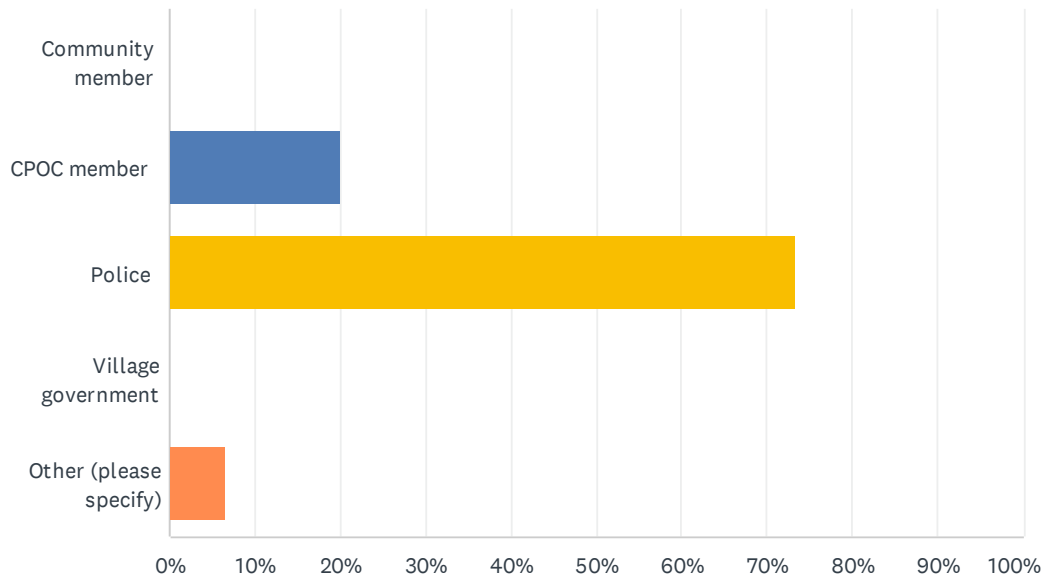


Phase 3: Consultation and Collaboration

- Creating a community guide to oversight, available in print and digital formats, that explains complaint processes, confidentiality rules, and CPOC's jurisdiction

Q1 What stakeholder group do you identify with?

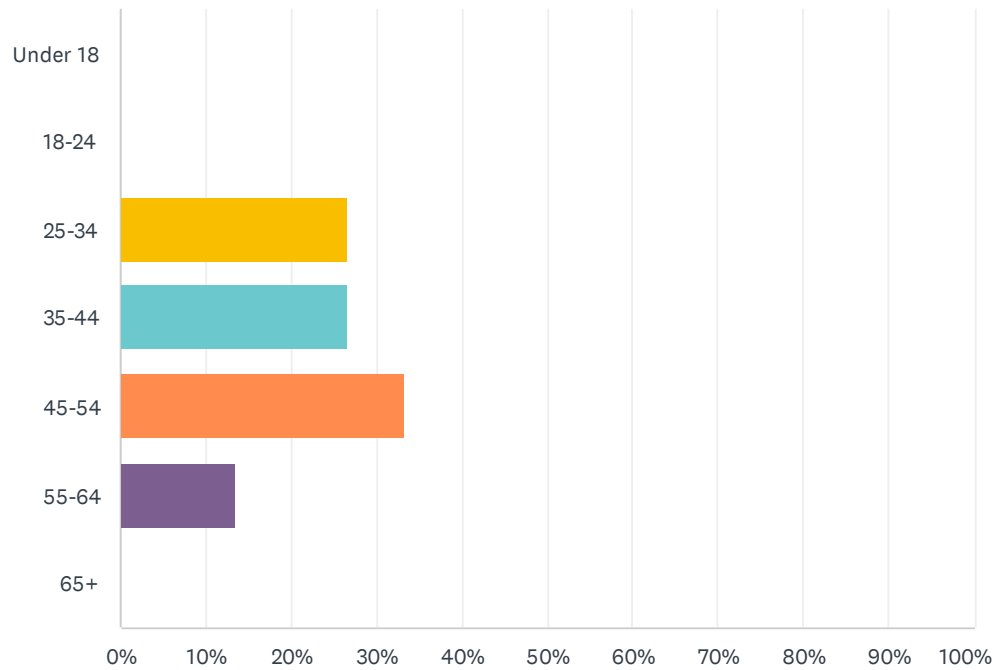
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Community member	0.00%	0
CPOC member	20.00%	3
Police	73.33%	11
Village government	0.00%	0
Other (please specify)	6.67%	1
TOTAL		15

Q2 In which age range do you fall?

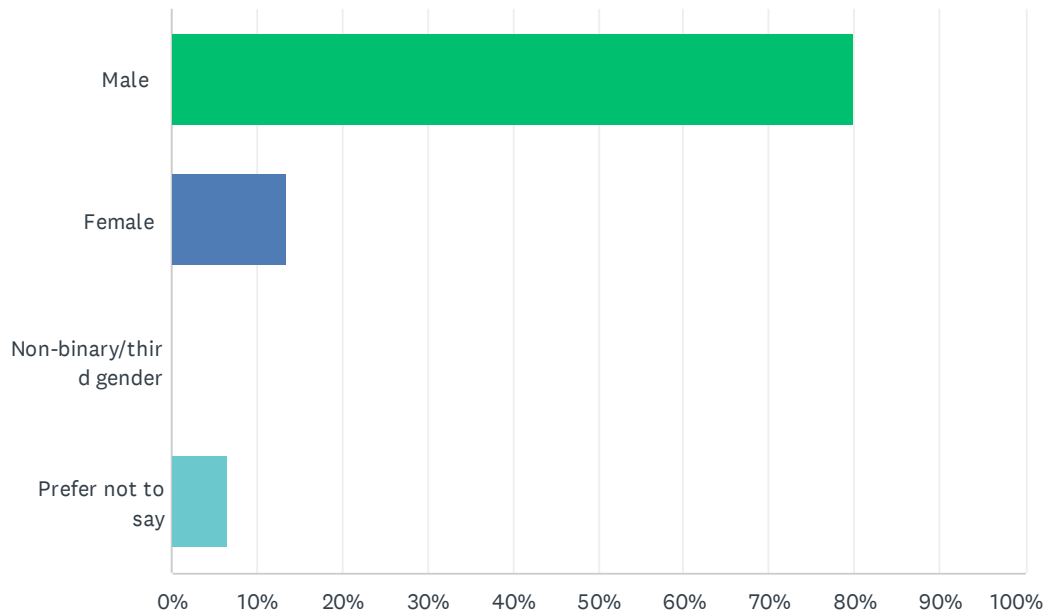
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18-24	0.00%	0
25-34	26.67%	4
35-44	26.67%	4
45-54	33.33%	5
55-64	13.33%	2
65+	0.00%	0
TOTAL		15

Q3 What gender do you identify as?

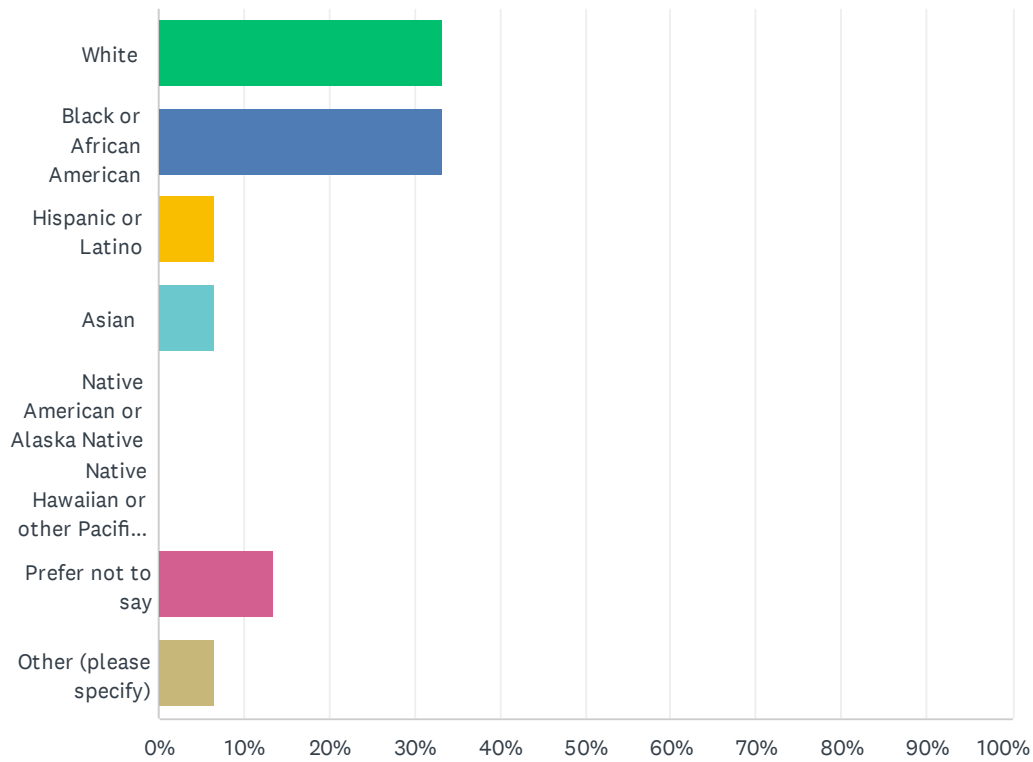
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Male	80.00%	12
Female	13.33%	2
Non-binary/third gender	0.00%	0
Prefer not to say	6.67%	1
TOTAL		15

Q4 How would you describe your race or ethnicity?

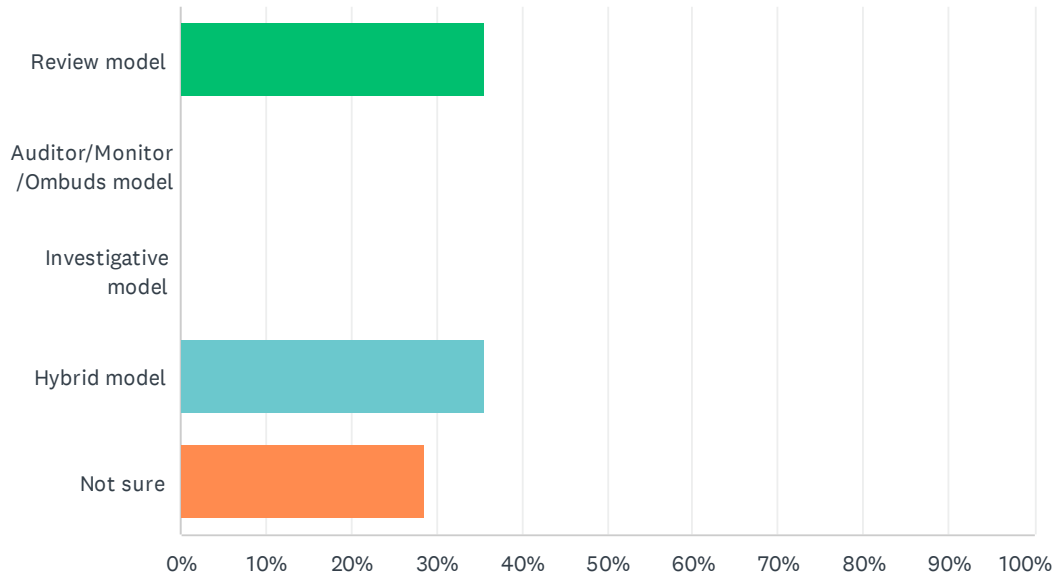
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
White	33.33%	5
Black or African American	33.33%	5
Hispanic or Latino	6.67%	1
Asian	6.67%	1
Native American or Alaska Native	0.00%	0
Native Hawaiian or other Pacific Islander	0.00%	0
Prefer not to say	13.33%	2
Other (please specify)	6.67%	1
Total Respondents: 15		

Q5 What model of civilian oversight do you believe is most appropriate for Oak Park?

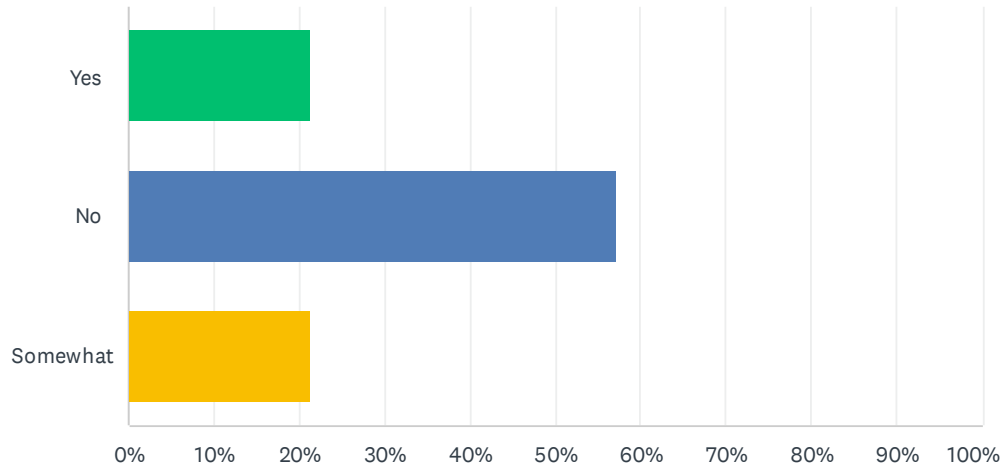
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Review model	35.71%	5
Auditor/Monitor/Ombuds model	0.00%	0
Investigative model	0.00%	0
Hybrid model	35.71%	5
Not sure	28.57%	4
TOTAL		14

Q6 Do you believe the current role and authority of the CPOC are clearly defined?

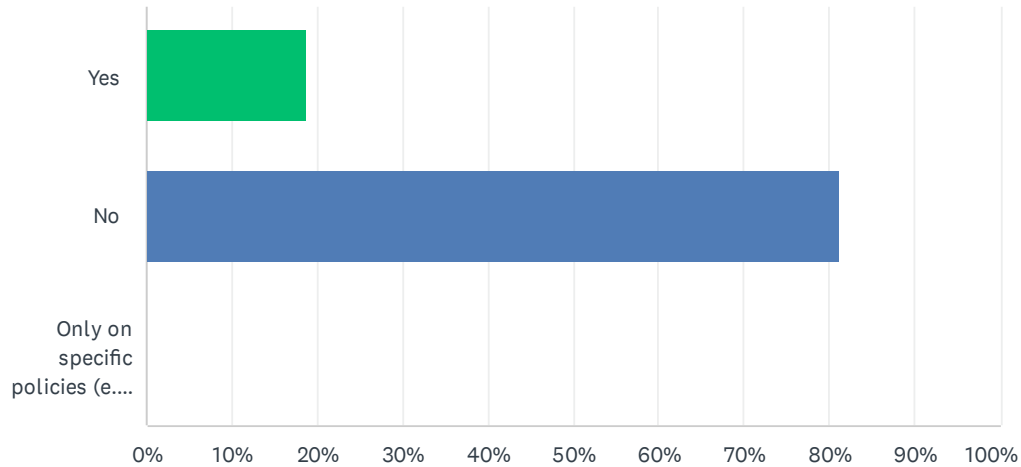
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	21.43%	3
No	57.14%	8
Somewhat	21.43%	3
TOTAL		14

Q7 Should the CPOC be involved in reviewing or making recommendations on police department policies?

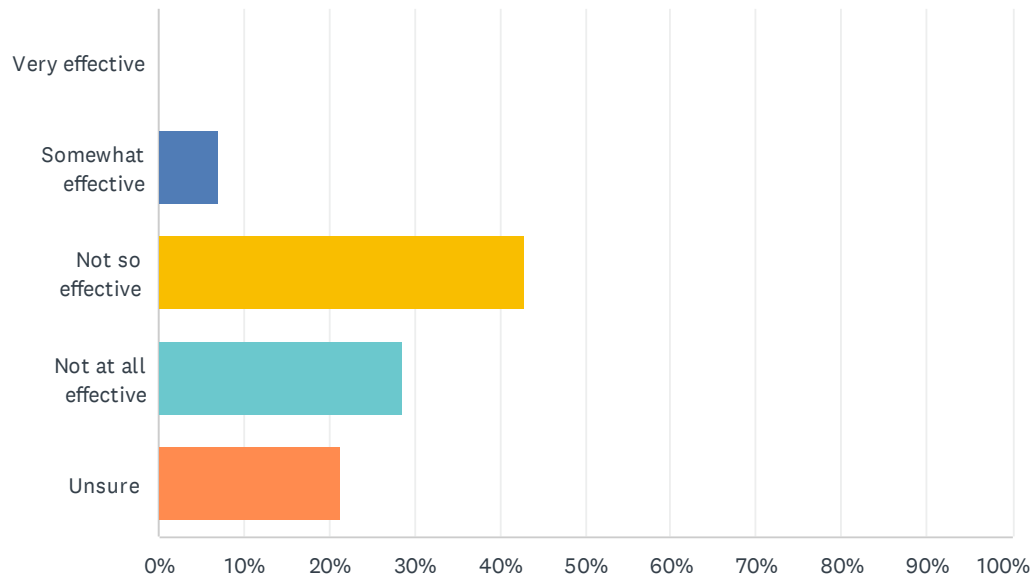
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	18.75%	3
No	81.25%	13
Only on specific policies (e.g. use of force)	0.00%	0
TOTAL		16

Q8 How effective is the CPOC at improving police accountability?

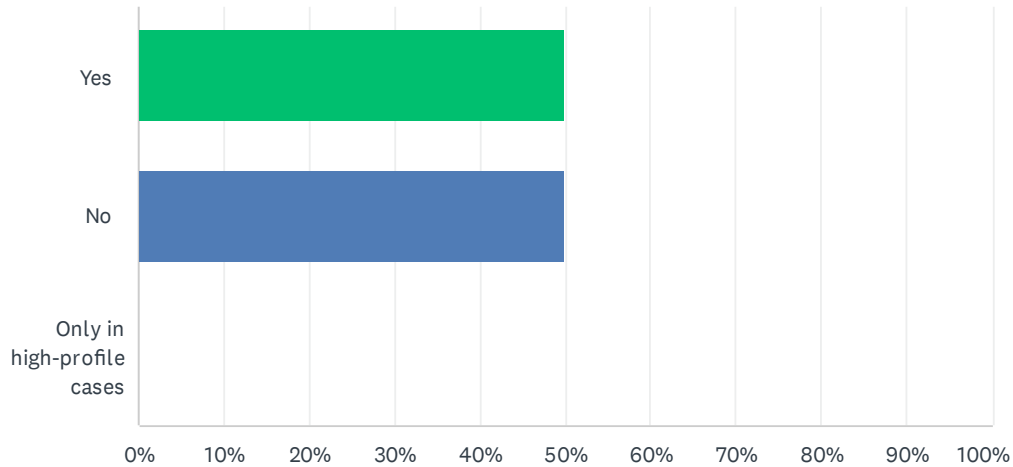
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Very effective	0.00%	0
Somewhat effective	7.14%	1
Not so effective	42.86%	6
Not at all effective	28.57%	4
Unsure	21.43%	3
TOTAL		14

Q9 Should the CPOC have the ability to provide feedback or make recommendations after each complaint review?

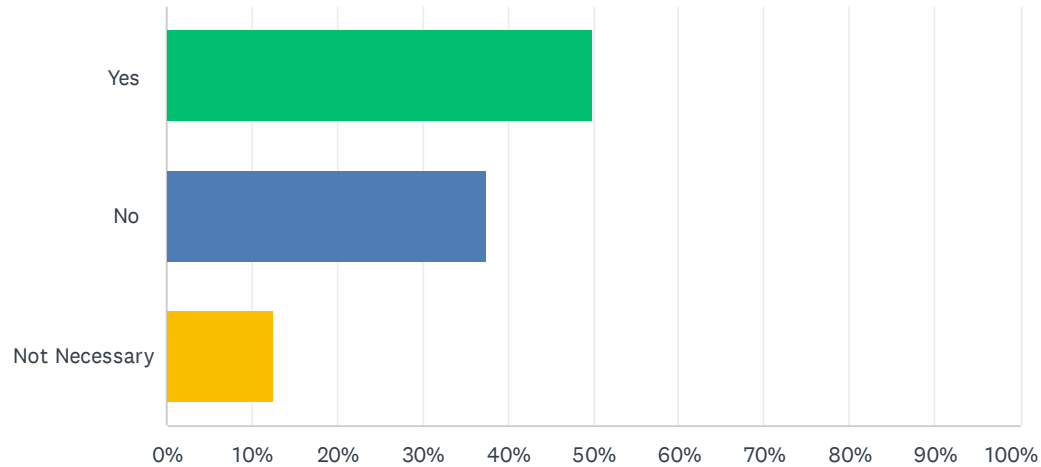
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	50.00%	8
No	50.00%	8
Only in high-profile cases	0.00%	0
TOTAL		16

Q10 Should there be a formal process for the police department to respond to CPOC recommendations?

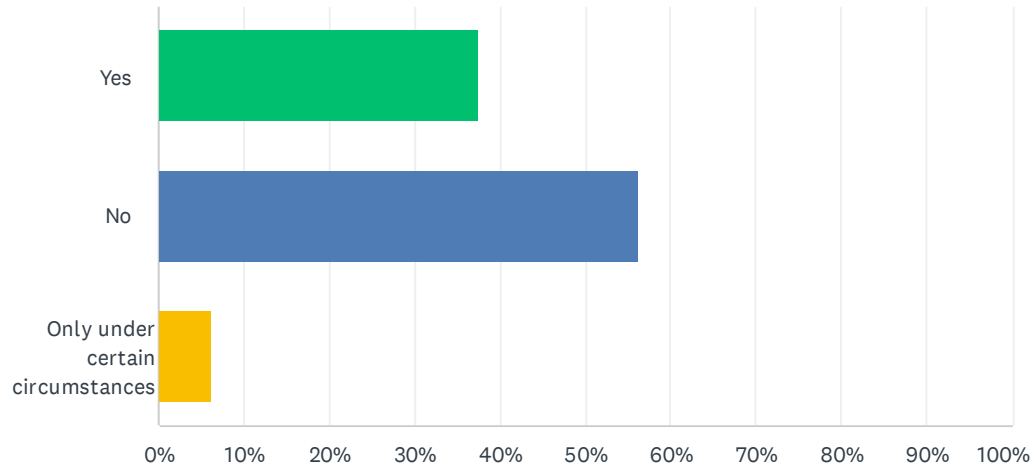
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	50.00%	8
No	37.50%	6
Not Necessary	12.50%	2
TOTAL		16

Q11 Should oversight of critical incidents (e.g. use of force, shootings) be a regular part of the CPOC's responsibilities?

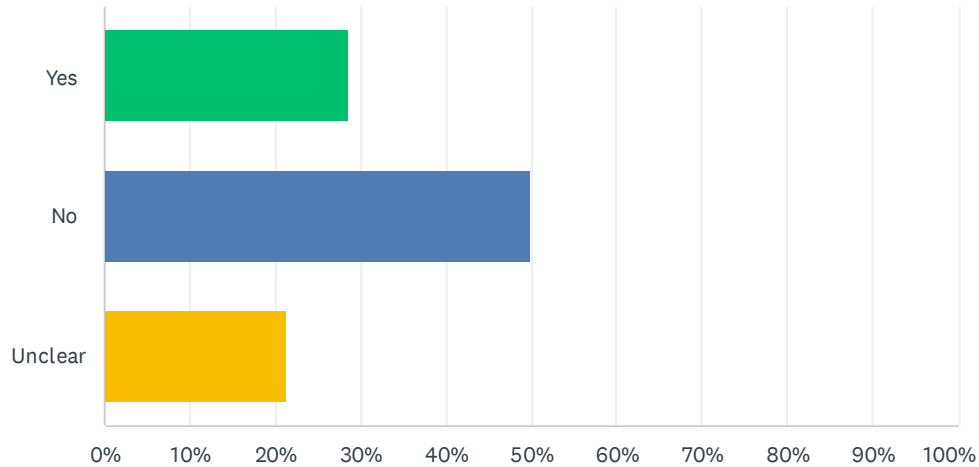
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	37.50%	6
No	56.25%	9
Only under certain circumstances	6.25%	1
TOTAL		16

Q12 In its advisory capacity to the board, does CPOC provide and/or report sufficient information on civilian oversight and policing?

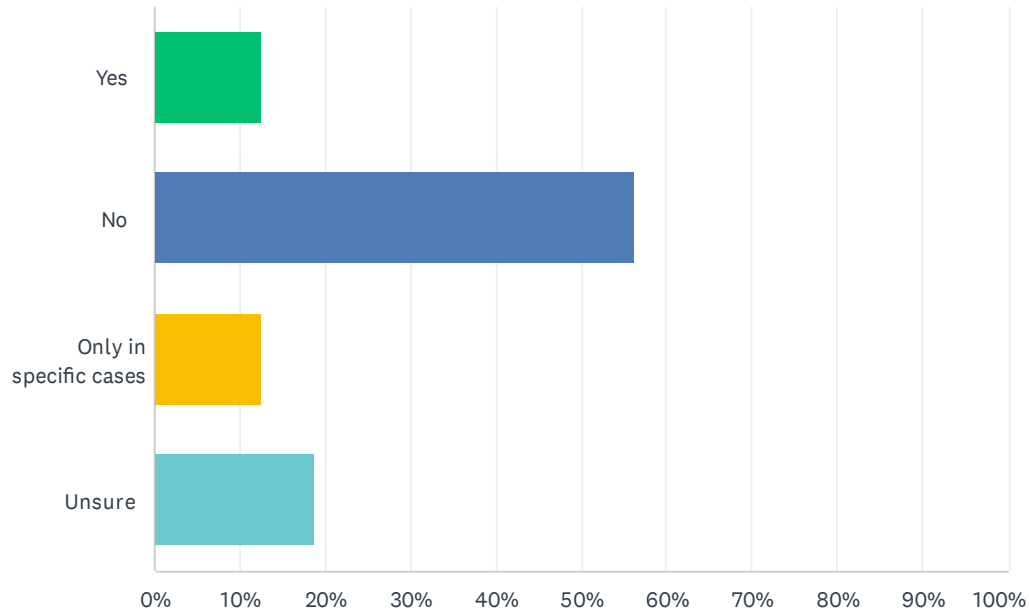
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	28.57%	4
No	50.00%	7
Unclear	21.43%	3
TOTAL		14

Q13 Should the CPOC have the authority to conduct independent investigations?

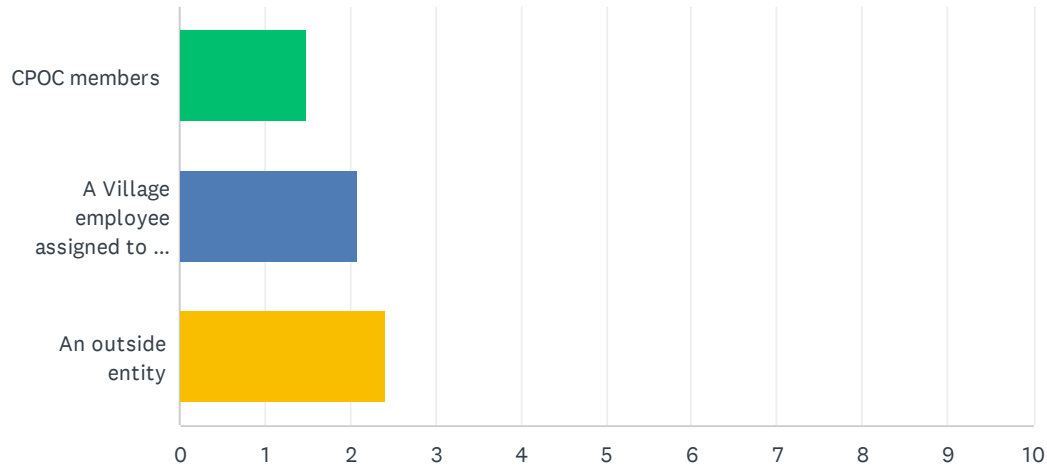
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	12.50%	2
No	56.25%	9
Only in specific cases	12.50%	2
Unsure	18.75%	3
TOTAL		16

Q14 If the CPOC conducts independent investigations, who should conduct the investigations? Please rank your preference below.

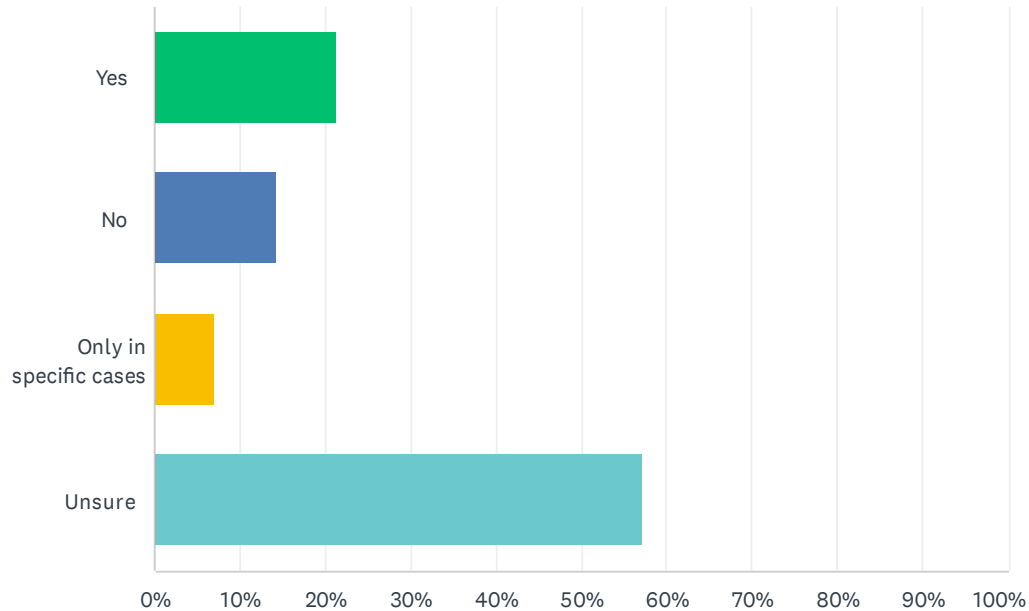
Answered: 12 Skipped: 4



	1	2	3	TOTAL	SCORE
CPOC members	0.00% 0	50.00% 6	50.00% 6	12	1.50
A Village employee assigned to the CPOC	33.33% 4	41.67% 5	25.00% 3	12	2.08
An outside entity	66.67% 8	8.33% 1	25.00% 3	12	2.42

Q15 Have there been opportunities for public involvement in oversight activities?

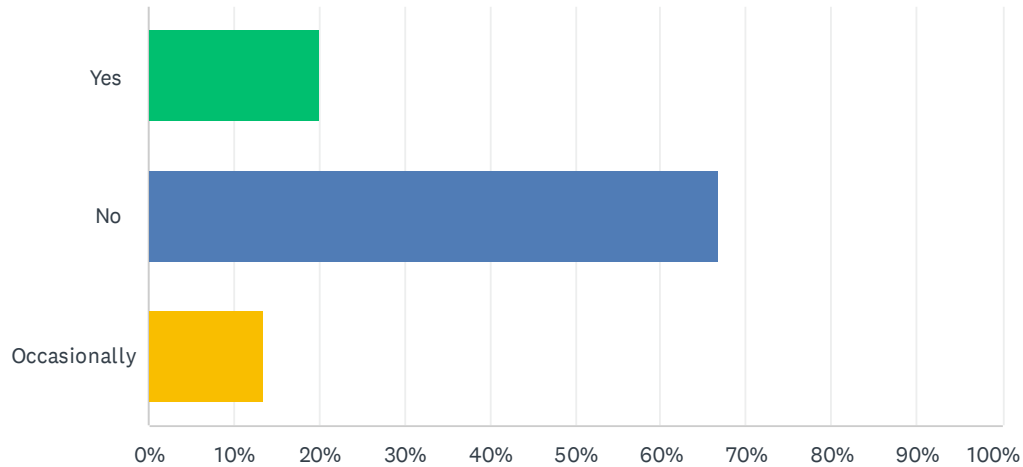
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	21.43%	3
No	14.29%	2
Only in specific cases	7.14%	1
Unsure	57.14%	8
TOTAL		14

Q16 Should the CPOC be required to host public forums or listening sessions?

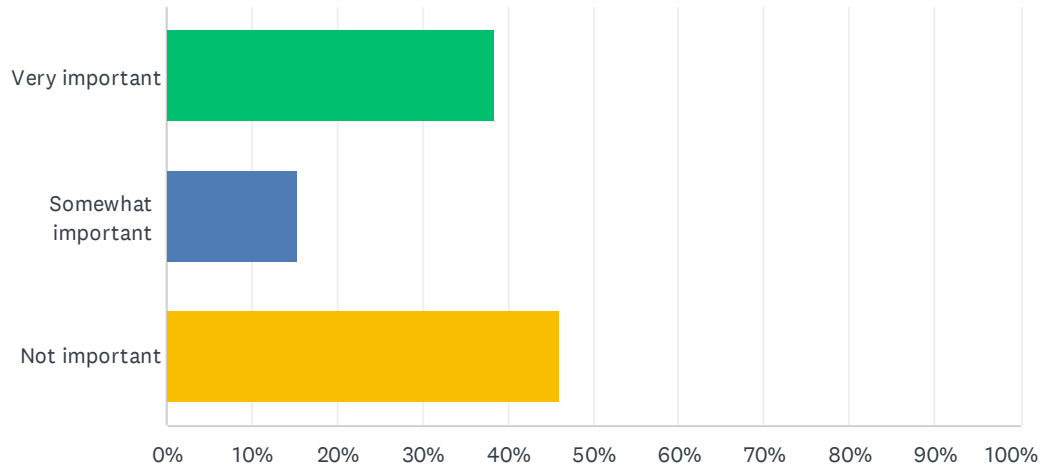
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	20.00%	3
No	66.67%	10
Occasionally	13.33%	2
TOTAL		15

Q17 How important is public reporting on complaint trends and oversight outcomes?

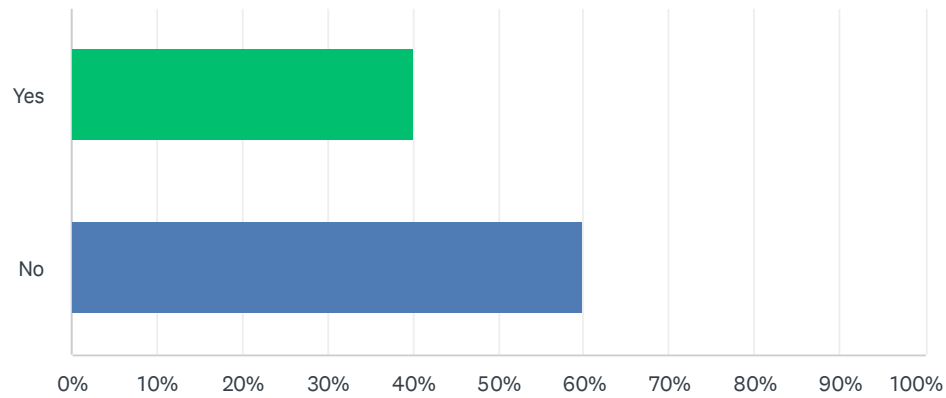
Answered: 13 Skipped: 3



ANSWER CHOICES		RESPONSES	
Very important		38.46%	5
Somewhat important		15.38%	2
Not important		46.15%	6
TOTAL			13

Q18 Have you ever attended a CPOC meeting?

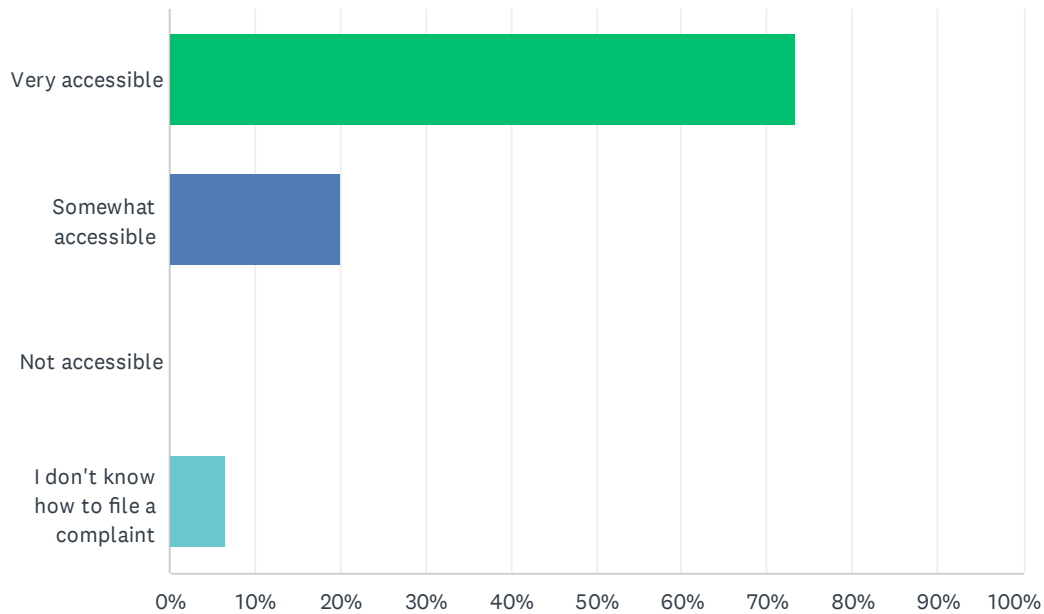
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	40.00%	6
No	60.00%	9
TOTAL		15

Q19 How accessible is the current process for filing a police complaint?

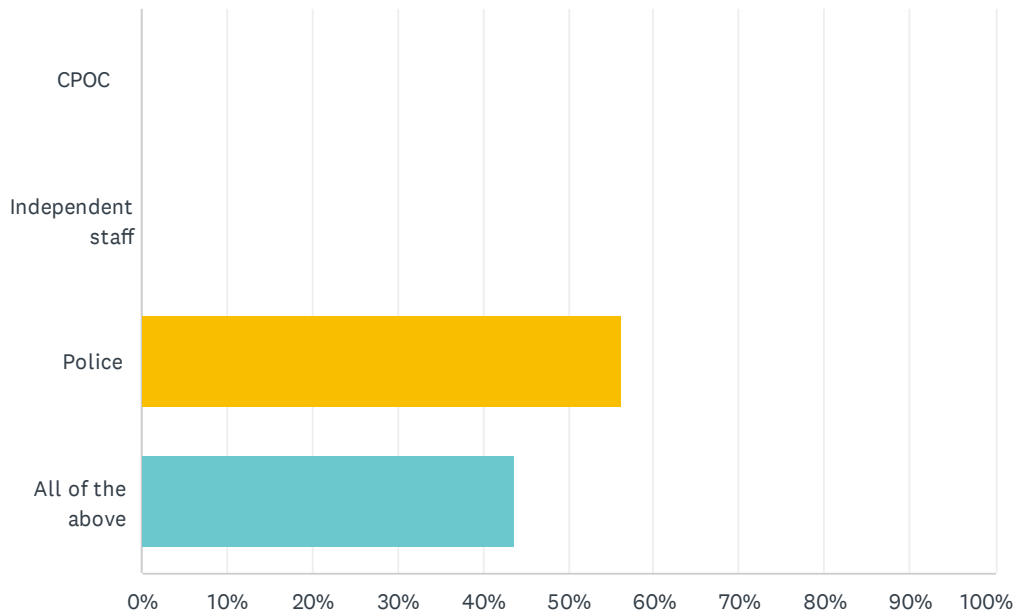
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Very accessible	73.33%	11
Somewhat accessible	20.00%	3
Not accessible	0.00%	0
I don't know how to file a complaint	6.67%	1
TOTAL		15

Q20 Who should be responsible for receiving complaints?

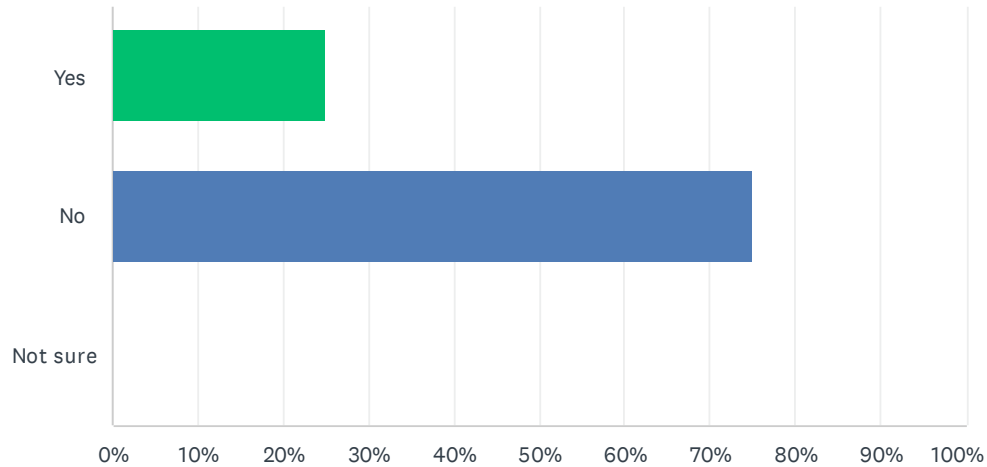
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
CPOC	0.00%	0
Independent staff	0.00%	0
Police	56.25%	9
All of the above	43.75%	7
TOTAL		16

Q21 Should CPOC have oversight over internal complaints (those made within the police department)?

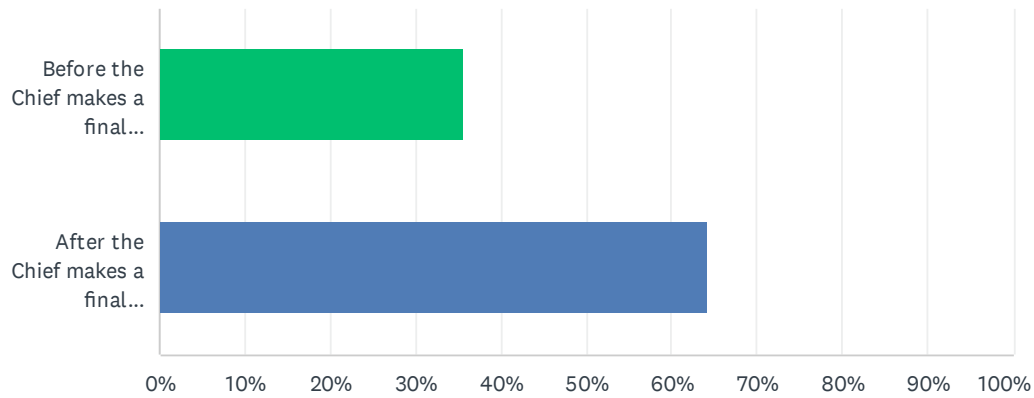
Answered: 16 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	25.00%	4
No	75.00%	12
Not sure	0.00%	0
TOTAL		16

Q22 When should the CPOC review investigations?

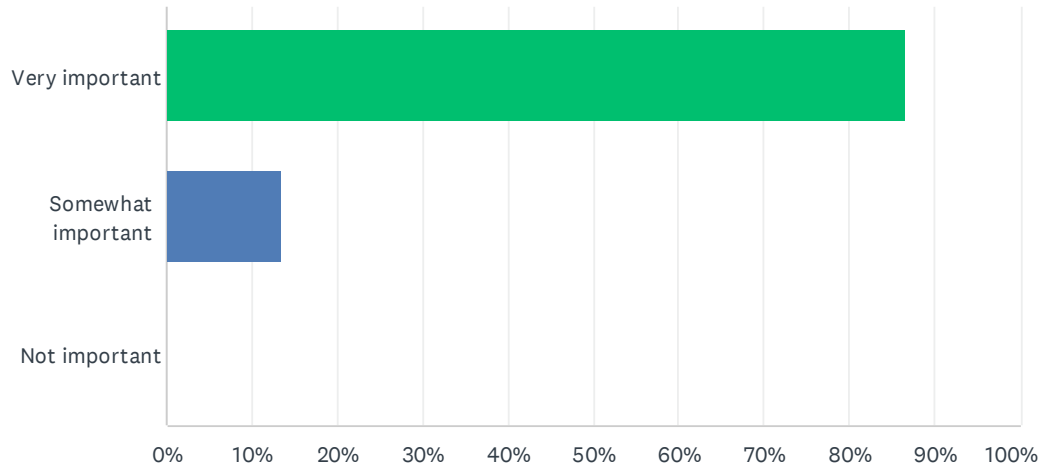
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Before the Chief makes a final disciplinary determination	35.71%	5
After the Chief makes a final disciplinary determination	64.29%	9
TOTAL		14

Q23 How important is formal training for CPOC members on police practices?

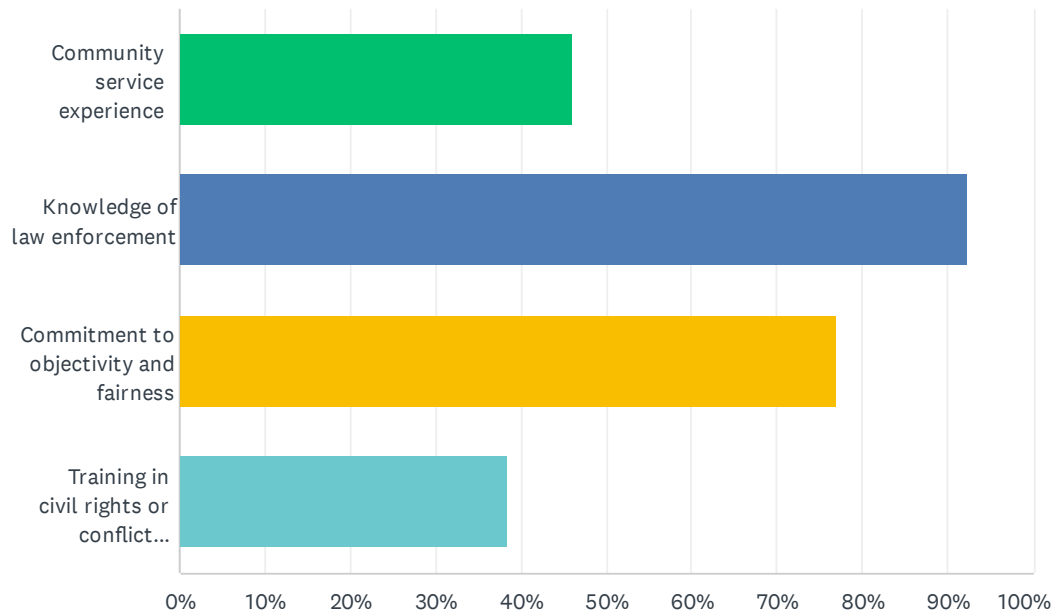
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Very important	86.67%	13
Somewhat important	13.33%	2
Not important	0.00%	0
TOTAL		15

Q24 What qualifications should be required CPOC members?

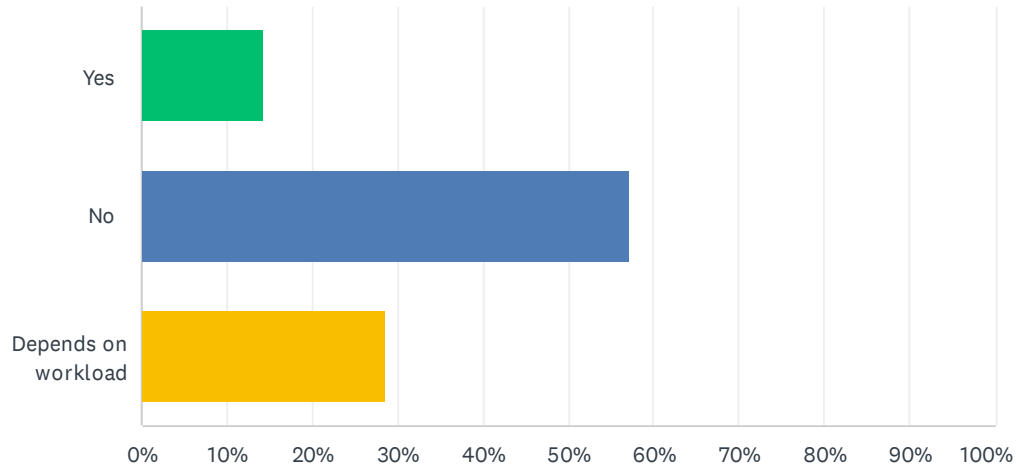
Answered: 13 Skipped: 3



ANSWER CHOICES	RESPONSES	
Community service experience	46.15%	6
Knowledge of law enforcement	92.31%	12
Commitment to objectivity and fairness	76.92%	10
Training in civil rights or conflict resolution	38.46%	5
Total Respondents: 13		

Q25 Should CPOC members receive compensation or stipends for their time and service?

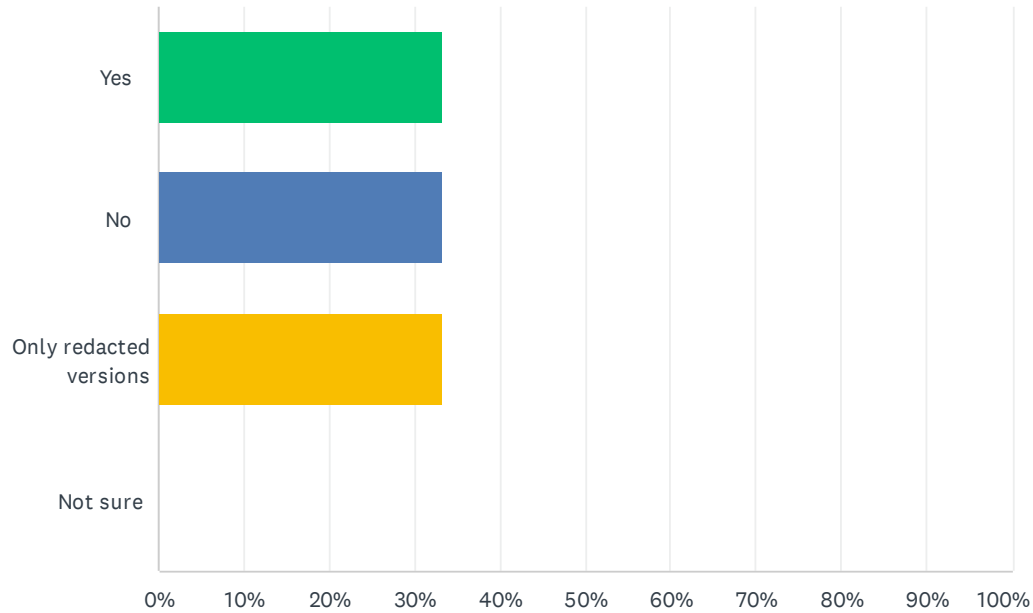
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	14.29%	2
No	57.14%	8
Depends on workload	28.57%	4
TOTAL		14

Q26 Should the CPOC have access to all police records and body camera footage related to complaints?

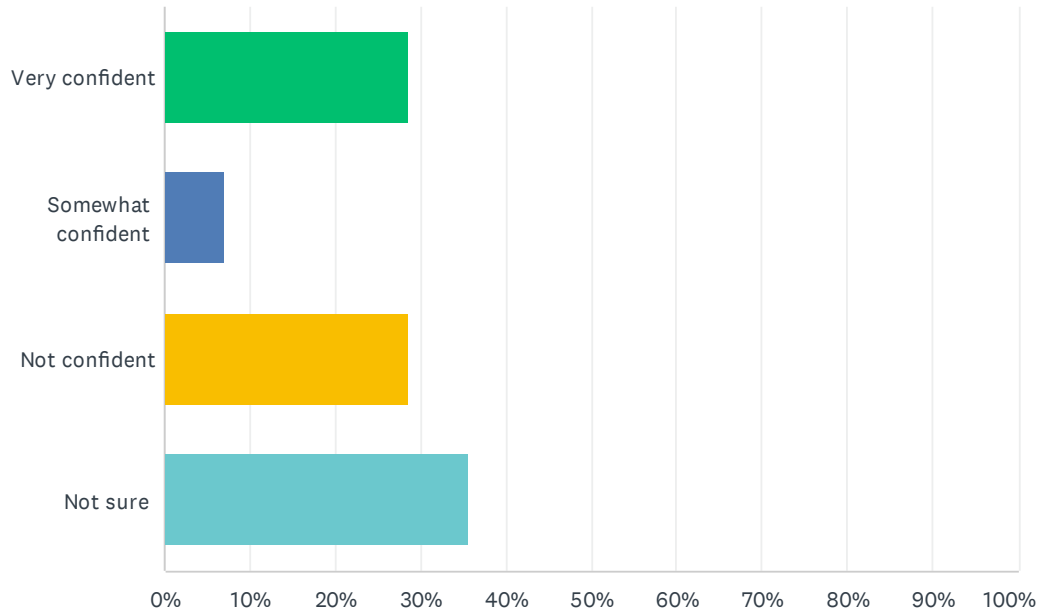
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	33.33%	5
No	33.33%	5
Only redacted versions	33.33%	5
Not sure	0.00%	0
TOTAL		15

Q27 How confident are you that the CPOC currently has sufficient access to the information it needs?

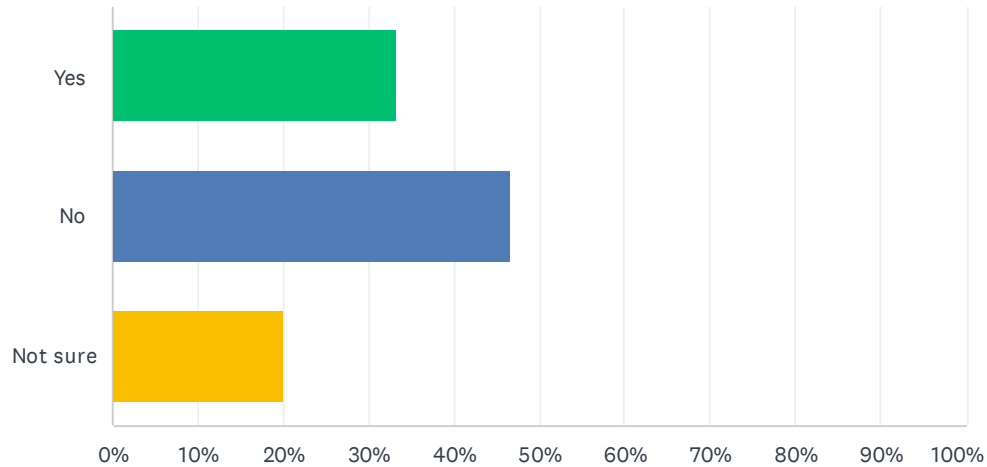
Answered: 14 Skipped: 2



ANSWER CHOICES	RESPONSES	
Very confident	28.57%	4
Somewhat confident	7.14%	1
Not confident	28.57%	4
Not sure	35.71%	5
TOTAL		14

Q28 Should the CPOC be responsible for reviewing data for existing and emerging technologies?

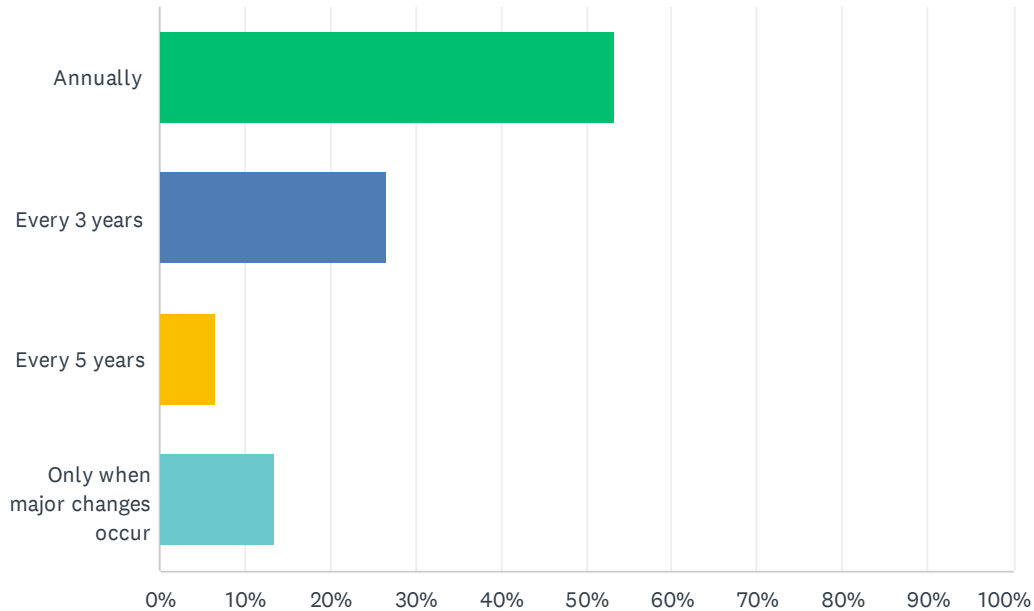
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	33.33%	5
No	46.67%	7
Not sure	20.00%	3
TOTAL		15

Q29 How often should Oak Park evaluate the effectiveness of its police oversight system?

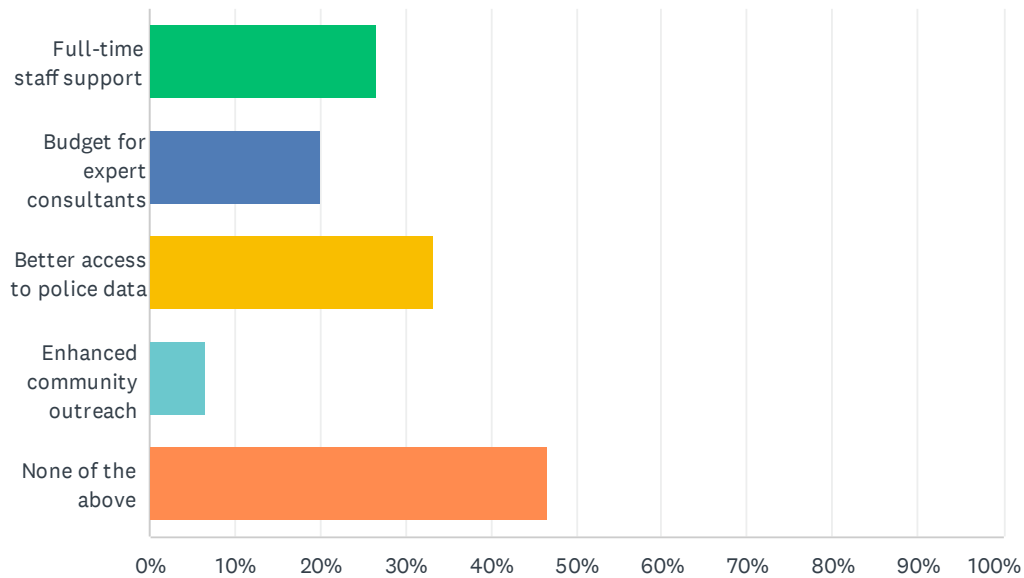
Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Annually	53.33%	8
Every 3 years	26.67%	4
Every 5 years	6.67%	1
Only when major changes occur	13.33%	2
TOTAL		15

Q30 What types of support would make the CPOC more effective?

Answered: 15 Skipped: 1



ANSWER CHOICES	RESPONSES	
Full-time staff support	26.67%	4
Budget for expert consultants	20.00%	3
Better access to police data	33.33%	5
Enhanced community outreach	6.67%	1
None of the above	46.67%	7
Total Respondents: 15		

Q31 In one sentence, what is the most important change you'd like to see in Oak Park's civilian oversight system?

Answered: 12 Skipped: 4

#	RESPONSES	DATE
1	For CPOC to observe what a typical day looks like for the OPPD. (dealing with mentally ill, criminals, etc).	4/23/2025 9:59 PM
2	Transparency between the two entities.	4/23/2025 4:41 PM
3	Solidifying the operating rules to increase transparency and accountability.	4/22/2025 7:39 PM
4	The most important change I'd like to see in Oak Park's civilian oversight system is an expanded, codified, role for the CPOC to review and opine on police complaints prior to the Chief's final disciplinary determination.	4/21/2025 3:47 PM
5	The most important change to the Oak Park's civilian oversight system would be trained, unbiased members focused on police accountability through collaboration.	4/21/2025 2:30 PM
6	law enforcement consultant(s) on committee	4/21/2025 5:11 AM
7	Monitor the actions of the chiefs.	4/21/2025 4:52 AM
8	Gone.	4/19/2025 5:38 AM
9	CPOC should be made up of average, ordinary everyday citizens, not just anti-police agenda pushers.	4/19/2025 1:47 AM
10	All prior law enforcement experience or disband.	4/18/2025 8:50 PM
11	dissolved, they are useless.	4/18/2025 3:23 PM
12	The system needs to show an unbiased mentality to the oversight.	4/18/2025 2:26 PM

Q32 How can CPOC's role in the Village be elevated?

Answered: 10 Skipped: 6

#	RESPONSES	DATE
1	By actually interacting with the oppd.	4/23/2025 9:59 PM
2	More frequent communication with community regarding cases, trends, etc.	4/22/2025 7:39 PM
3	Review of the Village Board, based upon metrics.	4/21/2025 3:47 PM
4	CPOC's role can be elevated with an updated policy to be more reflective of the current role as an advisory board.	4/21/2025 2:30 PM
5	more of a partnership with department to better learn each other's roles and responsibilities	4/21/2025 5:11 AM
6	Have them monitor the number of complaints generated by the chief. Monitor the the actions or lack of action by the chiefs.	4/21/2025 4:52 AM
7	n/a	4/19/2025 5:38 AM
8	N/A	4/19/2025 1:47 AM
9	N/A	4/18/2025 8:50 PM
10	Have more training so they know what they're talking about.	4/18/2025 3:23 PM

Q33 How do you measure CPOC's effectiveness?

Answered: 7 Skipped: 9

#	RESPONSES	DATE
1	i'm not sure. the effectiveness is minimal to oppd (non admin)	4/23/2025 9:59 PM
2	That we are effective in assuring that the PD is transparent and accountable and that all community members and visitors feel they are treated fairly and are safe.	4/22/2025 7:39 PM
3	Agreed upon quantifiable metrics, as approved by the Village Board.	4/21/2025 3:47 PM
4	Through a seamless collaborative approach on accountability with a reduction in elevating discussions to the Village Board.	4/21/2025 2:30 PM
5	consistent flow of information when needed	4/21/2025 5:11 AM
6	n/a	4/19/2025 5:38 AM
7	They really aren't necessary.	4/19/2025 1:47 AM

Q34 How do you measure the police department's effectiveness?

Answered: 9 Skipped: 7

#	RESPONSES	DATE
1	by keeping Oak Park safe and how safe the village is.	4/23/2025 9:59 PM
2	Look at the volume of calls for service measured for the actual numbers of sustained citizen complaints.	4/23/2025 4:41 PM
3	Providing a safe community for all while being fully transparent and accountable for their actions	4/22/2025 7:39 PM
4	Agreed upon quantifiable metrics, as approved by the Village Board.	4/21/2025 3:47 PM
5	Through a reduction in citizen's complaints and an increase in citizen's compliments.	4/21/2025 2:30 PM
6	evaluation of size town/department, CFS volume compared to other comparable depts and compare their citizen complaint/Internal Investigation #s	4/21/2025 5:11 AM
7	Amount of crime	4/21/2025 4:52 AM
8	n/a	4/19/2025 5:38 AM
9	Crime rates and arrest rates.	4/18/2025 8:50 PM

Q35 General comments or anything missed?

Answered: 6 Skipped: 10

#	RESPONSES	DATE
1	In general, the OPPD as a whole does not feel CPOC is effective. CPOC's questioning and lack of support for the OPPD drives morale down and makes the want to proactively police go down.	4/23/2025 9:59 PM
2	No.	4/22/2025 7:39 PM
3	N/A	4/21/2025 3:47 PM
4	CPOC SHOULD NOT BE POLITICALLY APPOINTED. ITS CURRENT MAJORITY ARE OUTSPOKELY BIAS AGAINST POLICE AND HAVE BEEN FOR THE PAST 8 YRS.	4/21/2025 4:36 AM
5	n/a	4/19/2025 5:38 AM
6	This is a complete waste of time	4/18/2025 3:23 PM

Appendix D - Phase 4: Findings and Recommendations Development

VILLAGE OF OAK PARK
CITIZENS POLICE OVERSIGHT RECOMMENDATION

Phase 4

FINDINGS & RECOMMENDATIONS DEVELOPMENT

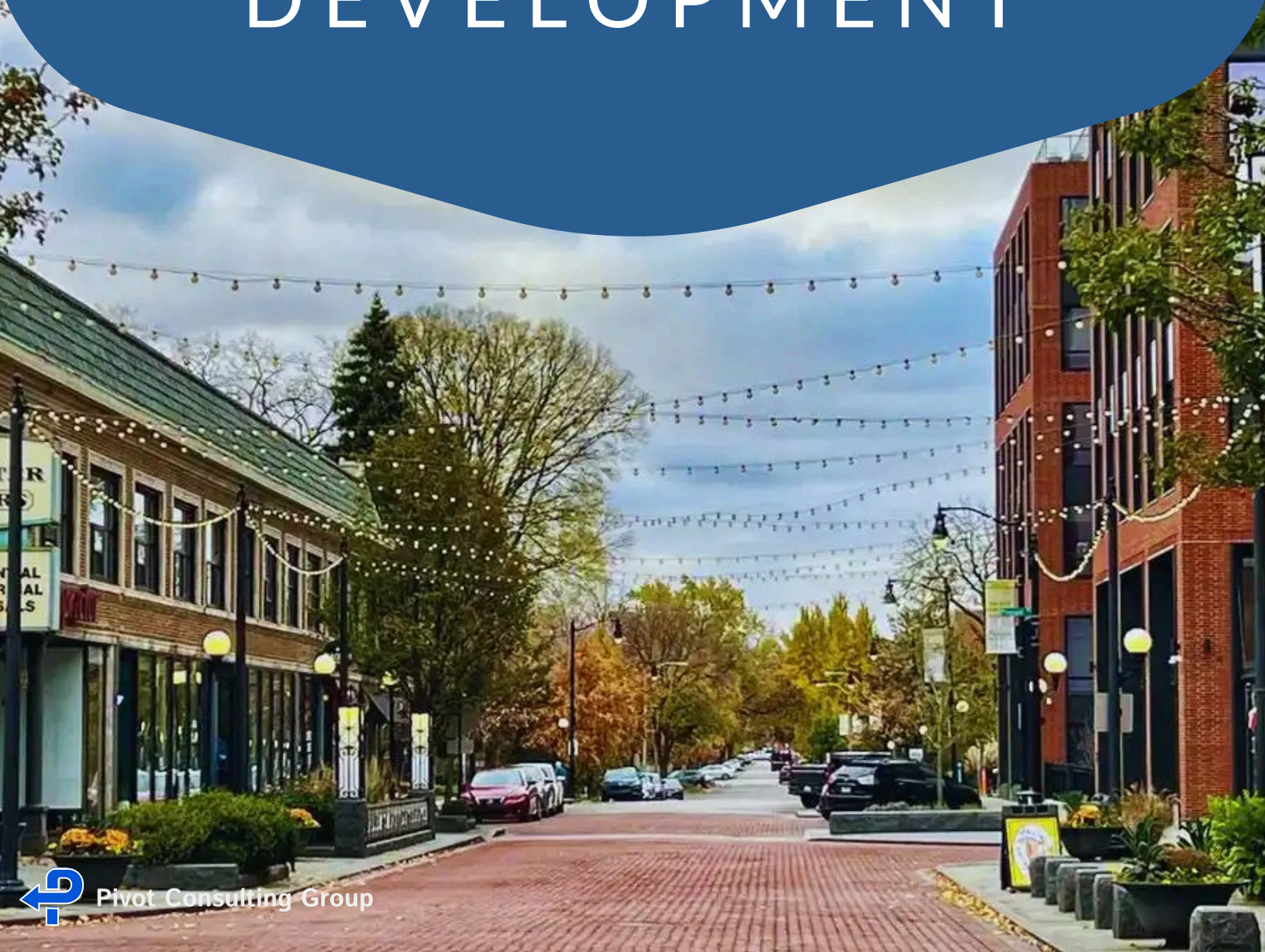




Table of Contents

I.	<i>Executive Summary</i>	2
II.	<i>Findings</i>	3
	Introduction	3
	Structural Weakness and Role Confusion	4
	Training, Capacity, and Professionalization	7
	Data, Technology, and Transparency Challenges	8
	Complaint Process and Review	11
	Cultural, Relationship, and Trust Barriers	17
	Vision for Reform and Success	19
	Findings Conclusion	21
III.	<i>Recommendations</i>	21
	Introduction	21
	Recommendation for an Oversight Model	22
	Short-Term Recommendations (0-6 months)	23
	Intermediate-Term Recommendations (6-18 months)	33
	Long-Term Recommendations (18+ months)	35
	Conclusion to Recommendations	37
IV.	<i>Proposed Action Plans</i>	37
	Short-Term Actions (0–6 months) - Launch Immediate Structural and Operational Reforms	38
	Intermediate-Term Actions (6–18 months) – Expand Capacity, Infrastructure, and Community Interface	39
	Long-Term Actions (18+ months) – Institutionalize Evaluation and Broaden Systemic Oversight	40



I. Executive Summary

Phase 4 of the civilian oversight assessment outlines a comprehensive plan to strengthen the Citizens Police Oversight Committee (CPOC) in Oak Park through a series of short, intermediate, and long-term reforms. These recommendations build on earlier findings and focus on establishing a durable oversight structure, expanding the committee's authority, improving public transparency, and formalizing core practices to ensure the CPOC can function as an effective, independent, and equity-focused body.

The implementation of the recommendations set forth in this report will require a phased approach. This structural approach will ensure authorities are in place that align the Village's goals with the expectations placed upon the CPOC moving forward. While phases are flexible, there are many aspects that will be helpful to accomplish before others. This project reflects Oak Park's commitment to putting into place an oversight model that ensures accountability of the OPPD that is fair, impartial, and upholds the principles of constitutional policing while considering how the police can keep the community safe.

In the short term (0-6 months), the Village should revise the CPOC's enabling ordinance, and update the Procedural Rules to reflect expanded responsibilities. Operational improvements should include the adoption of clear voting procedures, structured written recommendations for improvements regarding policies, training, and policing procedures to the police department, and an issue referral process for urgent or systemic concerns. The Village should launch a public compliment program and consider a mediation process to promote constructive resolution and strengthen community trust. To enhance transparency and accessibility, the CPOC webpage should be updated to include publishing all CPOC's reports including the annual report, as well as clearly explaining the complaint process, investigation timelines, and the committee's functions. The CPOC should also begin publishing complaint summaries, following the example of jurisdictions such as Indianapolis and East Lansing. Lastly, in anticipation of changes to staff and CPOC members, the Village should also develop and recruit the CPOC staff position and revise the CPOC appointment and vetting process to promote diversity, subject matter-expertise, and accountability among members.

Intermediate objectives (6-18 months) focus on implementing a staff-supported complaint review system, implementing ongoing training for CPOC members, updating data systems, and increasing community outreach. The long-term objectives (18+



months) emphasize the sustainment of the changes made to CPOC through institutionalizing policy evaluation, expanding the CPOC's purview to include systemic analysis of the entire complaint process, policy review and recommendations, and oversight of surveillance technology. The long-term objectives also include evaluation of CPOC performance and structure of the organization. These actions will allow the CPOC to transition from reactive case review to proactive policy analysis and ensure its sustained relevance and impact. Together, these enhancements will position the CPOC as a credible, community-centered oversight body equipped to advance fairness, accountability, and public safety in Oak Park.

II. Findings

Introduction

This section presents a comprehensive assessment of the CPOC current operations, as informed by stakeholder interviews, comparative benchmarking, community engagement, and multi-phase research. Each finding addresses both observed challenges and provides opportunities for reform. The findings are organized into six thematic categories:

1. Structural Weakness and Role Confusion
2. Training, Capacity, and Professionalization
3. Data, Technology, and Transparency Challenges
4. Complaint Process and Review
5. Cultural, Relationship, and Trust Barriers
6. Vision for Reform and Success

A consistent thread across the findings is that while Oak Park's oversight model reflects a long-standing commitment to civilian review, its current structure, resources, and practices could be improved to support the impactful and credible oversight that stakeholders desire. Stakeholders across all groups, including CPOC members, Village officials, community residents, and police leadership, expressed a shared desire for enhancements that balance accountability with collaboration, rooted in transparency, clarity, and sustained investment.



Phase 4: Findings & Recommendations Development

Taken together, the findings underscore that the path forward for the CPOC is not about expanding punitive authority, but about professionalizing its functions, clarifying its mission, improving access to information, and strengthening community trust. These changes will transform the CPOC into a proactive, systems-focused body capable of overseeing public safety outcomes for Oak Park that work for everyone.

Structural Weakness and Role Confusion

Finding 1. Stakeholders support strengthening the current committee structure rather than expanding into a full investigatory or disciplinary authority.

Stakeholders consistently expressed support for enhancing the committee's effectiveness within its current structure, rather than transforming it into an investigatory or disciplinary body. Police leadership emphasized that successful oversight should balance scrutiny with support, reinforcing trust, and elevating standards of service. Committee members highlighted the need for earlier involvement in the complaint process, timely access to case materials, and full visibility into relevant departmental data to conduct meaningful reviews.

Trustees viewed the committee as a vital accountability partner and saw value in expanding its role in policy and data oversight. Village staff acknowledged procedural and legal limitations of the current system, but their approach remained constructive and solutions oriented. One of the most consistent themes across all interviews was the need to modernize the Village's data infrastructure, particularly the outdated and manual systems used to track and analyze complaints. The shared sentiment supports a path forward focused on strengthening structure, access, and collaboration, without expanding into direct disciplinary authority.

Finding 2. Outdated Village Code and Procedural Rules have enabled the perception of “mission creep” and undermined clarity.

The civilian oversight structure in Oak Park, created in 1991, has not undergone substantive revisions in over three decades. The enabling Village Code outlines only three defined areas of authority for the CPOC: complaint referral and review, monitoring police department diversity efforts, and semiannual reporting to the Village Board. These narrowly scoped functions have led to ambiguity and both reduction and expansion of oversight functions over time. The CPOC has ventured into broader areas like policy review, surveillance technology oversight (e.g., Flock Safety cameras), and police data analysis, functions that exceed their original scope and have also seen some of their functions diminish, an example being oversight of internal complaints.



Phase 4: Findings & Recommendations Development

Stakeholder interviews revealed widespread concerns about “mission creep,” with police leadership and legal counsel emphasizing that the CPOC may be operating beyond its authorized scope. Meanwhile, CPOC members, community members, and some Village Trustees expressed support for these expanded roles in response to growing calls for transparency, equity, and accountability. This creates a natural tension that reflects the lack of structural clarity in the CPOC’s legal foundation.

Benchmarking from peer municipalities reinforces that Oak Park’s Village Code could formalize specific functions seen in more current and robust oversight models. In cities like Cambridge, MA and East Lansing, MI, the enabling ordinances include clearly articulated purpose statements, member qualifications, training requirements, and a detailed scope of authority (including data access, complaint involvement, and policy engagement).

The current CPOC Code contains a catch-all clause allowing reports to the Board on “special items of concern.” While such flexibility is important to address emergent community issues, the absence of parameters has led to inconsistency and role confusion. Effective practices recommend codifying oversight responsibilities with defined limits and processes to avoid overextension and maintain legitimacy.

Furthermore, the Procedural Rules, which have not been revised since their creation, no longer completely align with the CPOC’s evolving practices. Rules governing internal complaint review, access to investigative materials, and coordination with the police department are inconsistently followed or ambiguous. This mismatch between written rules and actual operations has also contributed to operational confusion.

Finding 3. The CPOC operates with undefined processes and the absence of formalities leading to inconsistent operations and diluted influence.

The CPOC’s lack of clear internal procedures has resulted in inconsistent practices, informal communication, and role confusion in the eyes of the police department, Village leadership, and the public. The absence of formalized protocols, such as standardized and formal voting procedures, documented recommendations, and formal communication mechanisms has left the committee functioning without a unified voice.

Vague Voting Process. The voting process is one of the most visible areas of ambiguity. The CPOC currently votes “aye” or “nay” on whether to uphold the Police Chief’s findings and disciplinary decisions on individual cases, as well as the investigative process. However, without clear criteria on what the Committee is voting on, members



Phase 4: Findings & Recommendations Development

may vote based on peripheral concerns rather than the investigative completeness or conduct in question. It is unclear whether votes are intended to reflect agreement with final findings and discipline, investigative quality, officer behavior, or systemic policy implications; leaving committee members questioning their impact. Benchmark models from other cities provide more structured approaches: Indianapolis votes on agreement with Internal Affairs findings and issues formal recommendations; Berkeley votes on whether an investigation was complete and unbiased; and Madison focuses on patterns and systemic implications, sometimes flagging individual cases for broader review.

Verbal Recommendations to the Police Chief. Similarly, the CPOC currently only issues verbal recommendations through conversational statements to a police representative during meetings, who then relays the recommendation to the Chief. This multi-step, informal process allows for potential distortion and miscommunication, and the lack of a formal communication, even when those recommendations have been implemented, has led to committee members feeling their concerns are not being listened to. Important items have fallen off agendas due to a lack of structured follow-through, resulting in a seeming diminished impact and accountability, even when the Police Chief has accepted and followed through on the recommendations.

Lack of Unity in CPOC Members' Actions. The lack of internal cohesion further undermines the committee's influence. A recent example involved the Village President requesting a unified memo on the pros and cons of Flock camera use; instead, two separate memos were submitted by individual members, giving the appearance of a fragmented body. Without protocols requiring majority-approved communications, the CPOC appears more like sub-groups of individuals than a unified advisory entity.

Limited Communications Between the CPOC and Police and the Village Board. Communication with both the police and Village Board remains limited and indirect. CPOC members do not have a formal mechanism to communicate directly with the Police Chief outside of meetings. All communication must be routed through designees or staff liaisons, which, combined with the part-time, volunteer nature of the committee, has slowed decision-making.

The CPOC's engagement with the Village Board is similarly constrained outside of the relationship that they have with the Village Board Liaison. Though authorized to report on special items of concern, the committee currently presents only semiannually through their reports. At a recent Village Board meeting, the staff liaison served as the primary speaker, while the CPOC Chair only answered questions. Despite Board members expressing support for the CPOC, the lack of direct communication and



Phase 4: Findings & Recommendations Development

formalized feedback loops limit the committee's feelings of influence on public safety policy and responsiveness to emerging issues.

Training, Capacity, and Professionalization

Finding 4. The CPOC lacks formal member training.

The absence of structured onboarding and ongoing training for CPOC members has created a capacity gap that undermines the committee's credibility and effectiveness in the eyes of stakeholders. CPOC members are currently appointed without receiving formal preparation in key areas such as due process, civil rights, investigative procedures, police protocols, union contracts, or legal standards. This lack of preparation can result in inconsistent evaluations and recommendations, and has diminished the weight of the committee's input with both the police department and the Village Board. There is also a concern about the objectivity of an oversight body that does not participate in training opportunities with the police department to gain first-hand knowledge of what officers are being trained on.

Stakeholders overwhelmingly recognized that volunteerism alone is insufficient for effective oversight. Survey data from the Phase 3 report found that 87% of respondents rated formal training as "very important," with strong support for modules on civil rights law, Illinois police statutes, police complaint processes, bias awareness, and professionalism in deliberation. In addition, both CPOC members and police officials emphasized the need for immersive exposure to police operations through ride-alongs, roll calls, citizens' academies, and observation of department in-service training sessions.

Comparative benchmarking confirms that all civilian oversight boards examined in the Phase 2 research require some form of structured training. Most combine initial onboarding with annual refreshers and engage third-party providers such as NACOLE or local experts to deliver content. Many also establish collaborative training sessions with police departments to foster mutual understanding and reduce misinterpretation.

Finding 5. Dedicated staff is needed to carry out the CPOC's functions and duties and ensure timely, impactful work.

The scale and complexity of the CPOC's responsibilities which can include complaint intake, case review, policy analysis, data interpretation, and community engagement exceed what can reasonably be expected of a part-time, all-volunteer committee. Numerous reports and stakeholder interviews identified this capacity gap as a major



Phase 4: Findings & Recommendations Development

barrier to operational consistency, credibility, and timeliness. The Phase 1 report noted that delayed reporting, up to 18 months in one instance, stemmed from the CPOC's limited capacity.

The Phase 3 report further emphasized that even recent improvements in logistical support, such as agenda preparation and meeting management, are insufficient by themselves to meet the committee's long-term needs. The CPOC currently relies on a single staff liaison who concurrently holds significant other Village leadership responsibilities. Members, staff, and community stakeholders all pointed to the need for a dedicated position such as a staff liaison or data analyst to serve as a liaison across departments, support data-driven decision-making, and manage day-to-day operations. Without this professionalization, volunteer burnout, procedural delays, and inconsistent follow-through are likely to continue.

The Phase 2 Effective Practices benchmarking confirms that comparable review-model oversight bodies, from East Lansing, MI to Indianapolis, IN, maintain dedicated staff to manage case tracking, interface with the community, and provide reporting. These jurisdictions demonstrate that sustained investment in oversight staffing enables better accountability outcomes, timely reviews, and increased public trust.

In addition to administrative and logistical support, dedicated staff could ensure continuity in complaint handling, maintain communication with the police and Village departments between meetings, and enhance the CPOC's analytical capacity. This would allow the committee to focus more fully on its strategic oversight role, including contributing to policy reform, equity goals, and institutional accountability.

Ultimately, resourcing the CPOC with a professional staff person will significantly enhance operational functions and provide an impactful structural reform that would position the Village and the committee for long-term success and public legitimacy.

Data, Technology, and Transparency Challenges

Finding 6. Limitations in current data systems present challenges to OPPD's responding to the CPOC's evolving information needs.

While the Oak Park Police Department (OPPD) has consistently expressed a commitment to transparency and a willingness to collaborate with the CPOC, the department's capacity to fulfill many of the committee's data-related requests is severely constrained by outdated systems and infrastructure. As noted in the Phase 3



Phase 4: Findings & Recommendations Development

report, the police department's current complaint tracking and records management systems are heavily reliant on manual processes, which inhibit the ability to quickly extract trend data, generate demographic breakdowns, or produce timely updates on complaint outcomes.

Village officials and staff acknowledged that the department's technical limitations, not resistance to oversight, are often the root cause of delays or inconsistencies in fulfilling requests. One official described trying to understand complaint patterns as navigating "a wall of PDFs," and another noted that the CPOC's well-intentioned but often custom or one-off data requests cannot be easily accommodated without better tools and staffing. This challenge is compounded by legal and contractual constraints, such as privacy laws and union agreements, which further complicate the production and sharing of sensitive information without standardized protocols in place. It is noted that the Village is well aware of this limitation and is currently in the process of implementing improvements in this area.

Despite these constraints, OPPD and Village leaders have expressed openness to solutions, including the creation of shared documentation systems, hiring a neutral data analyst, and developing structured templates or dashboards that can both support the CPOC's oversight goals and reduce staff burden. These enhancements would allow for more reliable and timely data sharing, better alignment of the CPOC's oversight functions with the operational realities of policing, and ultimately more meaningful accountability.

Until such systems are modernized and resourced, the capacity to respond to variable and individualized data inquiries will continue to limit the CPOC's ability to monitor trends, assess equity impacts, and evaluate systemic issues in a timely and credible fashion.

Finding 7. Gaps in data access and clarity contribute to mistrust between the CPOC and OPPD.

CPOC members and community stakeholders consistently expressed concerns about limited or incomplete access to case materials, body worn camera (BWC) footage, and investigative documentation. In particular, the committee often receives redacted summaries or edited video excerpts during executive session, limiting their ability to evaluate complaints with full context. Members noted that access to BWC footage is controlled by OPPD representatives during meetings and is not independently available for pre-meeting review, which significantly narrows the time and scope for thorough oversight.



Phase 4: Findings & Recommendations Development

Police officials also point to historical requests by committee members to only show the pertinent portions of the BWC footage as complete review of all footage in a meeting is simply not possible due to the amount of BWC footage that can be available.

While Village leadership broadly supports transparency and has shown interest in improving data-sharing protocols, the current infrastructure and practices reflect historical caution. Legal and police officials emphasize the importance of privacy, data integrity, and workload limitations when determining what can be shared. Some stakeholders within OPPD view BWC footage as sufficient context and are hesitant to release full investigative files, citing concerns over misuse or misinterpretation.

Disagreements are especially pronounced around access to Flock camera data. CPOC members emphasize the importance of analyzing patterns of stops, searches, and racial disparities. However, the data shared has at times been incomplete, with some requested fields such as race or gender omitted. Police leadership has raised concerns that even when data is shared, it is not always tied to actionable policy insights, and may lead to unnecessary burdens on the police department without a clear oversight purpose.

This mismatch in expectations between the committee's desire for full transparency and the department's concern for data control and operational feasibility has fostered a sense of mistrust. CPOC members have questioned whether redactions and delays are overly broad or strategic, while police officials have voiced concerns that data requests may be misaligned with the CPOC's formal mandate.

To restore confidence and foster a more collaborative oversight environment, stakeholders emphasized the need for clearly defined access protocols, a shared understanding of data use, and investment in data infrastructure that supports both transparency and security. These steps are essential to advancing a culture of accountability grounded in trust.

Finding 8. Building analytical capacity is essential to support evidence-informed oversight.

There is widespread agreement that increasing transparency through data access must be paired with the capacity to analyze and interpret that data. Without this, the CPOC's ability to draw meaningful conclusions or influence policy is limited. Both Village officials and CPOC members have suggested an addition of a dedicated data analyst to help identify trends, support investigations, and develop public-facing dashboards.



Phase 4: Findings & Recommendations Development

Current systems are not designed to support deep analysis, and stakeholders noted that even when data is shared, it often lacks context or structure. Benchmarking shows that other review bodies invest in analytical expertise to assess equity impacts, policy effectiveness, and compliance patterns. Strengthening the CPOC's professional analytical capability would allow the committee to produce more evidence-based recommendations and increase the credibility and strategic value of its oversight.

Complaint Process and Review

Finding 9. The CPOC lacks formal compliment and mediation programs, limiting its ability to promote positive engagement and restorative solutions.

The CPOC currently does not operate a formal compliment program or maintain its own channel for community members to recognize positive officer conduct. While the CPOC webpage links to the OPPD's existing compliment submission form, it does not offer an independent or committee-led process. This limits the CPOC's ability to publicly acknowledge exemplary policing or reinforce police behaviors that align with community values and expectations.

The CPOC also lacks a mediation program, a tool commonly used by other oversight bodies to resolve lower-level complaints through facilitated, voluntary dialogue between officers and complainants. Mediation offers a constructive, non-adversarial alternative to formal investigations, particularly in cases involving communication breakdowns or minor misconduct. Without it, the CPOC misses an opportunity to foster mutual understanding, reduce repeat complaints, and build public confidence in the complaint process.

Establishing both compliment and mediation programs would help balance the CPOC's oversight approach, expand its community engagement capacity, and strengthen trust in public safety oversight.

Finding 10. The CPOC's current structure limits its ability to provide meaningful oversight and drive improvements in public safety policies.

The CPOC is significantly constrained in its capacity to provide impactful oversight of OPPD complaint processes or to promote operational and procedural reforms that enhance public safety and accountability. As highlighted in BerryDunn's Finding 5-4, the committee lacks the authority, access, and structural tools necessary to influence outcomes or implement recommendations that address root causes of community concern.



Phase 4: Findings & Recommendations Development

Without clearly defined authority to analyze trends, monitor complaint processing outcomes, or recommend corrective action, the CPOC's oversight is largely procedural and reactive. The absence of mechanisms to translate review findings into meaningful change, whether through policy updates, training reforms, or systemic evaluation, undermines the committee's potential to serve as a driver of continuous improvement.

To enhance the CPOC's value and effectiveness, adjustments to its enabling ordinance and operational framework are needed. These adjustments should clarify the CPOC's authority, expand its scope to include systemic policy influence, and establish formal pathways for collaboration and feedback with the OPPD and Village leadership.

Finding 11. The CPOC's complaint review is primarily case-by-case, limiting its systemic impact.

The CPOC currently concentrates much of its oversight on individual complaint reviews, which is most appropriate in high-stakes or high-profile incidents such as officer-involved shootings, in-custody deaths, or major use-of-force cases. In these instances, case-by-case analysis helps ensure accountability, public trust, and independent scrutiny of departmental investigations.

However, an overemphasis on individual cases limits the committee's ability to identify broader patterns and root causes. The long-term value of civilian oversight lies in its capacity to drive systemic improvement through analyzing trends, uncovering recurring issues, and recommending structural reforms that improve public safety, officer conduct, and community trust. A systemic focus enables proactive risk monitoring and supports collaborative solutions aimed at preventing harm rather than simply reacting to it. By complementing case reviews with broader policy and practice evaluations, the CPOC can play a more strategic and constructive role in shaping the future of public safety in Oak Park.

Finding 12. Complaint investigations are prolonged and delay resolution for years.

A persistent challenge within Oak Park's oversight system is the extended duration of complaint investigations. Stakeholders consistently report that investigations often stretch well beyond a year, despite procedural guidelines and contractual expectations that call for resolution within 45 to 120 days. Stakeholders agreed across all segments that complaint investigation, discipline, and review need to be accomplished in a timelier manner.



Phase 4: Findings & Recommendations Development

Several factors contribute to these delays, including manual and fragmented workflows, inconsistent intake practices, police leadership transitions, and challenges in accessing necessary documentation. These prolonged timelines frustrate community members and oversight officials, while also negatively impacting officer morale by extending periods of uncertainty. The lack of timely resolution erodes trust in the complaint process both internally and externally and reduces the overall effectiveness of civilian oversight in promoting accountability and fairness. Further, it erodes officer confidence that the accountability program is fair.

Finding 13. The complaint process lacks transparency and public accessibility.

The current complaint review process lacks transparency, limiting public trust in oversight. Although Village Code tasks the CPOC with receiving and referring complaints, this function is not being fulfilled. The CPOC no longer directly receives complaints, and its webpage redirects users to the OPPD's complaint form without clearly explaining how the process works or what to expect. Hyperlinks to alternate filing options such as the Village Manager's Office or Community Relations Department lead only to general landing pages, with no guidance on how to file a complaint, investigation timelines, or outcome notifications.

There is also limited public access to complaint review proceedings or outcomes. CPOC discussions of complaints, including viewing body-worn camera footage, take place in executive session, and the public is asked to leave. While a recent improvement now ensures complainants are informed by the OPPD when investigations are delayed, no summaries of reviewed complaints are published on the CPOC's website. In contrast, other jurisdictions such as Indianapolis and East Lansing provide publicly accessible complaint summaries that include case details, review outcomes, and additional board actions. CPOC members have emphasized that transparency is a key indicator of the committee's success. To align with this mandate and public expectations, greater clarity, communication, and public-facing documentation of the complaint process are essential.

Finding 14. Gaps remain in OPPD transparency around Internal Affairs complaints provided to the CPOC.

Despite improvements since the 2022 BerryDunn study, such as limited access to BWC footage during meetings, the OPPD continues to limit providing complete Internal Affairs (IA) complaint materials to the CPOC. While the department generally supplies many of the items listed in the Procedural Rules, gaps persist. The CPOC does not consistently



Phase 4: Findings & Recommendations Development

receive complete complaint forms, supporting documentation, or ongoing progress updates, all of which are essential for thorough oversight.

Furthermore, current procedural limitations mean the CPOC is not entitled to access key investigatory materials such as recorded interviews, full police reports, BWC footage outside of supervised settings, or officer disciplinary histories. Additionally, all materials received are redacted. This restricts the committee's ability to conduct fully informed reviews. In areas related to monitoring racial and cultural diversity, OPPD does share data on hiring, training, and Flock-related stops, but that information has been seen as inconsistent by CPOC members across reports. These limitations reduce the CPOC's ability to provide comprehensive, equity-focused oversight and fulfill its mandate under the Village Code.

Finding 15. The CPOC does not review internal complaints despite clear mandates to do so.

Although the Procedural Rules, and the 2022 BerryDunn study both affirm that the CPOC is authorized and expected to review both internal and external complaints, the committee currently does not review complaints initiated within the police department. There is no formal documentation explaining why this function lapsed. Some stakeholders have speculated that internal complaint review may have been restricted through collective bargaining with the police union, though this has not been verified.

The exclusion of internal complaint review, even cursory in nature, limits the CPOC's ability to fulfill its chartered role of providing the Village Board with a comprehensive and balanced view of the OPPD's complaint handling system. Without access to internal complaints, the committee is unable to assess officer-to-officer relations, evaluate consistency in disciplinary standards, or offer insight into the full scope of complaint trends and processing outcomes. As a result, the Village Board receives only a partial view of departmental accountability and oversight, hindering efforts to monitor internal culture and systemic performance.

Internal complaint review has been a practice that has lapsed to the point that stakeholders cannot remember conducting them. It is worth noting that the capacity of the CPOC is not set up to handle the increased volume a full internal complaint review would entail. Additionally, many internal complaints involve subject matter that are more appropriately handled by police or human resources processes. Examples of these can include, but are not limited to minor workplace issues, work assignments, grooming standards, uniform policies, management behavior (that does not include misconduct,



Phase 4: Findings & Recommendations Development

and other similar matters). However, there are instances in which it would be appropriate to include the CPOC on some categories of internal complaints. Examples of these types of complaints would be matters of community concern such as, but not limited to, an officer acted inappropriately with a member of the public and a community complaint was not filed, an officer used inappropriate or excessive force, or an officer's response to a call for service was inadequate.

Finding 16. Several Procedural Rules are not consistently followed by the Village, OPPD, and the CPOC.

While the Procedural Rules were established to guide complaint oversight, several provisions are not being fully implemented by the Village, OPPD, or the CPOC, limiting transparency, accountability, and alignment with the CPOC's authorized role.

1. **Complaint Intake and Referral:** The CPOC is not involved in the complaint process until after the OPPD investigation is completed. However, the Procedural Rules authorize the committee to participate earlier at the intake stage to determine whether additional information is needed, outside investigation is warranted, or if the complaint is an inquiry that should be referred elsewhere.
2. **Investigation Timelines:** The Procedural Rules set clear benchmarks of 60 days for informal investigations and 120 days for formal ones. However, the CPOC has reviewed cases that significantly exceed these timelines, with some investigations taking up to two years. The CPOC is not currently positioned to monitor or address these delays during the investigation process.
3. **Complaint Appeals and Dissatisfaction:** The CPOC is not reviewing police investigations when complainants express dissatisfaction with the outcome, as called for in the Procedural Rules. These rules direct the committee to evaluate the department's findings and consider any new information or concerns presented by the complainant.
4. **Anonymity and Confidentiality:** The OPPD does not consistently anonymize the identities of complainants and officers as required. Although many reports use generic identifiers (e.g., "Ms. W" or "Officer #110"), other documents have disclosed full names or partial identifiers, potentially compromising confidentiality.
5. **Systemic Issues and Discriminatory Practices:** The CPOC does not currently investigate systemic issues, such as patterns of racial or gender bias or broader discriminatory practices, even though the Procedural Rules provide for this function when such matters are referred by the Board of Trustees.



Phase 4: Findings & Recommendations Development

6. **Incomplete Complaint Records:** The OPPD does not routinely provide the CPOC with full documentation required by the Procedural Rules. Instead of full case files including complaint forms and supporting materials, the CPOC receives brief summaries, limiting the depth of its oversight.
7. **Recruitment and Hiring Data:** The Director of Human Resources/Secretary to the Fire and Police Commission does not regularly report to the CPOC on recruitment efforts, exam outcomes, or progression through police training programs, despite requirements in the Procedural Rules to track this data.

Collectively, these inconsistencies highlight a gap between the intended design of oversight and current practice, and underscore the need for renewed procedural alignment to support transparency, effectiveness, and trust.

Finding 17. When the CPOC requests information or data that the police determine is outside of their scope, there is no dispute resolution process and the CPOC request goes unanswered indefinitely.

Currently, when the CPOC requests data or information that the Police Department determines falls outside of the CPOC's scope, there is no formal process to resolve the disagreement. As a result, such requests often go unanswered indefinitely. For example, during observed meetings, the CPOC requested the restoration of two data columns previously removed from a training report. The Police Chief declined, and despite the CPOC citing Procedural Rules to justify the request, there was no structured method to escalate or mediate the issue.

In practice, the Police Chief's decision is final, with no opportunity for external review or clarification. This dynamic can foster frustration, create unnecessary tension between the oversight body and the department, and consume time and effort in repeated cycles of request and denial. Without a formal mechanism for resolving disputes, the process lacks transparency, weakens oversight, and limits the CPOC's ability to access the information needed to fulfill its mandate effectively.

Finding 18. The CPOC's role in complaint intake needs clarification and earlier involvement.

CPOC members have consistently expressed concern about being brought into the complaint review process too late, often after investigations have concluded and discipline has already been imposed. According to the Phase 3 report, this delay reduces the committee's impact, as reviews of "cold cases" feel symbolic and limit the



Phase 4: Findings & Recommendations Development

committee's ability to evaluate the fairness and completeness of investigations. Members advocate for a timelier and more meaningful role, ideally beginning during or immediately after internal investigations, before final disciplinary decisions are made.

This perspective aligns with provisions in the Village Code and Procedural Rules, which state that the CPOC is responsible for receiving citizen complaints alongside other Village departments and for conducting intake under certain conditions. However, in practice, the CPOC does not currently receive complaints directly.

Stakeholders interviewed as part of the Phase 1 and Phase 3 assessments suggest there is shared interest in earlier CPOC involvement to improve transparency and prevent post-investigation disagreement. Police leadership also acknowledges that earlier engagement may prevent awkward disagreements after decisions are finalized. However, legal and operational concerns, such as confidentiality and union obligations, have been raised, with some cautioning that premature expansion of the CPOC's role could inadvertently delay or complicate complaint resolution processes.

Cultural, Relationship, and Trust Barriers

Finding 19. Trust and communication between CPOC and police leadership remains fragile.

The relationship between the CPOC and the OPPD has evolved over time, shaped by differing perspectives and periods of limited engagement. Past public safety discussions have, at times, created tensions and misunderstandings, which continue to influence the current dynamic. Although communication has often been routed through formal channels, there is a shared interest in improving the quality and frequency of dialogue.

Both CPOC members and police leadership acknowledged the importance of a more collaborative, trust-based partnership rooted in mutual respect and shared goals. CPOC members view their role as supportive of accountability and public trust, while police officials have expressed an appreciation for the committee's intentions, even as they seek clarity around its scope. Moving forward, there is strong support for establishing regular touchpoints such as structured meetings, joint learning opportunities, and open dialogue. Strengthening these connections will enhance transparency, improve coordination, and foster a more productive oversight environment.

Finding 20. The relationship between the CPOC and police leadership lacks clear structure and shared expectations.



Phase 4: Findings & Recommendations Development

The relationship between the CPOC and police leadership would benefit from clearer structure and shared expectations to support more effective communication and collaboration. Currently, committee members have varying perspectives on police leadership's role in meetings, and past tensions have contributed to misunderstandings on both sides. Police leaders have also expressed concerns about the scope of CPOC's work and has approached engagement as discretionary.

To strengthen mutual understanding and promote constructive dialogue, the Village should consider formalizing communication protocols and defining how the committee and police leadership interact. Establishing a shared framework can help ensure consistent expectations, promote respectful engagement, and reinforce the committee's advisory role within the broader public safety structure.

Finding 21. Community trust in civilian oversight is limited by perceptions of weak authority and visibility.

Community feedback, particularly from historically marginalized groups, reveals a lack of awareness and confidence in the CPOC's role and impact. During public engagement sessions, residents expressed skepticism about whether the committee has any meaningful authority or is simply symbolic. Many questioned whether the CPOC can compel police cooperation, whether it has ever challenged an investigation's outcome, and whether its recommendations carry weight.

This perception gap diminishes public trust in oversight and weakens its legitimacy as a mechanism for accountability. Compounding the issue, some community members were unfamiliar with the CPOC's existence or functions, signaling a broader need for public education and transparency. The erosion of trust is mutual: some oversight members perceive police leadership as guarded or resistant, while police officials view the committee as overly adversarial or misaligned with operational realities.

Improving the CPOC's visibility, clarifying its authority, and investing in community engagement are critical steps to rebuilding trust and ensuring the oversight process is understood, respected, and valued by all stakeholders.

Finding 22. The CPOC appointment process lacks clear criteria compared to other oversight agencies, raising concerns about objectivity and public confidence.

The current process for appointing CPOC members lacks formal qualifications or eligibility standards beyond residency and a general consideration of diversity. This absence of clear



Phase 4: Findings & Recommendations Development

requirements for objectivity has raised concerns among stakeholders about politicization and perceived bias. Some fear that appointments based solely on discretion, without publicly defined selection criteria, may lead to ideological imbalances, diminish objectivity, and foster factionalism within the committee.

While the Village Code specifies that the CPOC must include seven Oak Park residents appointed by the Village President and encourages consideration of diversity, it does not include guidance on professional qualifications, community representation, or ethical standards. In contrast, the committee's removal process, requiring written charges, a public hearing, and a majority vote by the Village Board, offers a far more structured safeguard, prompting some stakeholders to suggest the appointment process should carry comparable rigor.

Benchmarking shows that many peer jurisdictions include clearly articulated appointment standards in their ordinances. For example, Indianapolis limits partisan representation on its board and uses police district task forces for nominations. Cedar Rapids restricts appointments of recently elected officials and individuals with a history of frequent police complaints, while also requiring representation from nonprofit professionals and service providers working with underrepresented communities. Pasadena mandates that at least 50% of its board be women and reserves seats for members of community-based organizations.

These structured appointment models not only ensure broad representation and transparency, but also protect the legitimacy of the oversight body by preventing perceived or actual politicization. Clarifying and strengthening the CPOC's appointment process would align Oak Park's oversight structure with national effective practices and build greater public trust in its impartiality and effectiveness.

Vision for Reform and Success

Finding 23. The CPOC's scope and mission remain unclear and require formal clarification.

Stakeholders across the community, Village leadership, and the police department share a consistent perspective: for the CPOC to be effective, its mission and scope must be clearly defined. Despite differences in approach, there is broad agreement that the CPOC should focus on systemic oversight such as policy analysis, data-informed review, and recommendations for improvement rather than expanding into investigatory or disciplinary roles that it is neither resourced nor structured to support.



Phase 4: Findings & Recommendations Development

The current ambiguity around the CPOC's purpose has contributed to confusion, strained relationships, and operational inefficiencies. Clarifying the committee's role will help align expectations, reduce friction with the OPPD, and ensure that the CPOC can deliver meaningful, credible oversight. Defining its mission in ordinance and procedural rules anchored in transparency, equity, and systemic improvement will also support community understanding and elevate the committee's impact.

Finding 24. Investment in professional and structural reform is essential to strengthen oversight.

For the CPOC to operate effectively and fulfill its mandate, sustained investment in both structural and professional capacity is necessary. Across reports and stakeholder input, several foundational reforms have emerged as essential: modernizing the enabling ordinance to clarify authority and scope; formalizing complaint intake and review procedures; strengthening internal data infrastructure; and establishing professional staff roles such as a staff liaison, analyst, or coordinator to ensure consistent operations.

The current volunteer-based structure cannot meet the demands of oversight in a modern policing environment without assistance. Without dedicated resources, the CPOC faces challenges in data analysis, case management, follow-through, and coordination with Village departments. Investing in infrastructure and staffing would not only improve procedural consistency and oversight credibility but also enable the committee to shift from reactive to proactive work focusing on policy review, systemic reform, and community engagement.

Finding 25. Strengthening community engagement is critical to building trust and visibility.

The need for deeper and more intentional community engagement emerged as a consistent theme across community sessions and stakeholder interviews. Residents emphasized that for oversight to be legitimate and effective, it must be visible, responsive, and representative of the community it serves. There is currently a disconnect between the public, police, and the CPOC, contributing to skepticism about the oversight process and its outcomes. Community members called for more transparent communication through public reporting of complaint outcomes, trend data, and clear explanations of how complaints are filed and handled.

Trust-building efforts such as restorative justice initiatives, community healing events, and regular public forums were also recommended. These strategies would not only promote



Phase 4: Findings & Recommendations Development

transparency but also help transform the CPOC from a reactive body into a proactive bridge between the community and law enforcement.

Findings Conclusion

The findings in this report reflect a clear consensus: Oak Park's civilian oversight system, while grounded in strong community values and intent, requires enhancement and reform to achieve its full potential. Structural ambiguity, limited capacity, outdated procedures, and strained relationships have hindered the CPOC's ability to provide meaningful, trusted, and effective oversight. However, stakeholder's found consensus around many areas of the path forward.

From Village officials to community members and police leadership, there is shared support for strengthening the CPOC's role within its current framework, investing in professional capacity, modernizing enabling ordinances, and fostering transparent, collaborative relationships. With clearer expectations, dedicated staffing, improved data infrastructure, and a more engaged and diverse community voice, the CPOC can evolve into a proactive, policy-focused oversight body that contributes to both accountability and public trust in Oak Park.

III. Recommendations

Introduction

This section outlines a set of recommendations to improve the structure, function, and impact of civilian oversight in Oak Park. These proposals respond directly to the challenges identified through community engagement, benchmarking research, document reviews, and stakeholder interviews conducted over multiple phases of analysis.

The overarching goal is to strengthen the CPOC as a credible, transparent, and impactful oversight body that balances accountability with constructive partnership.

Recommendations focus on continuous improvement, clarifying legal authority, standardizing and modernizing procedures, professionalizing operations, enhancing data infrastructure, and improving public engagement.



Phase 4: Findings & Recommendations Development

Importantly, these recommendations are designed to support the CPOC's work within its advisory and oversight capacity, not to transform it into a disciplinary or investigatory agency. The emphasis remains on enabling the CPOC to monitor trends, elevate standards, and promote equity in public safety with professionalism, consistency, and public trust.

To facilitate implementation, the recommendations are organized by anticipated time period:

- **Short-term** actions should be initiated immediately to begin implementing recommendations, this will require coordination, budget planning, or process development;
- **Intermediate-term** objectives build upon the progress of the changes made in the short-term;
- **Long-term** initiatives include the sustainment phase of the updated civilian oversight model and periodic evaluation of the CPOC's performance and structure.

This tiered structure is intended to guide the Village's strategic planning, help prioritize efforts, and support the development of actionable implementation plans.

Recommendation for an Oversight Model

Recommendation 1. Pivot recommends that the Village of Oak Park consider adopting a review model like the Cambridge, Massachusetts Police Review and Advisory Board for restructuring the CPOC. The Cambridge model exemplifies a robust review board structure where the board serves as the final civilian oversight authority on complaints and is supported by an executive director. This director is accountable to the board but also assumes operational responsibilities, such as monitoring and coordinating investigations, researching and drafting reports and recommendations for the CPOC, and supporting community engagement. The CPOC would continue to review investigative findings, issue recommendations on the findings, training, and revisions to departmental policies and procedures, and issue reports. This structure strengthens the board's independence, increases operational efficiency, and enhances community trust in the oversight process.

However, while the Cambridge model is a strong starting point, it requires key modifications to align with Oak Park's specific oversight goals and the CPOC's evolving scope of responsibilities. Oak Park's CPOC has, or is expected to have, enhanced authority that includes formal inclusion in the review of proposed police surveillance



Phase 4: Findings & Recommendations Development

technologies, expanded complaint intake and monitoring functions, and systemic policy review. With these modifications, Oak Park can benefit from the proven strengths of the Cambridge model, strong board authority, dedicated staffing, and independent review, while building a structure that reflects the expanded scope and forward-looking oversight vision of the CPOC.

Short-Term Recommendations (0-6 months)

1. Modernize and Align CPOC Governance Framework

Recommendation 2. Pivot recommends that the Village undertake a comprehensive update of both the CPOC’s enabling ordinance and Procedural Rules to clarify its mission, expand its oversight authority, and ensure consistency between policy and practice. This dual-track modernization effort will align CPOC’s governing documents with its current and evolving responsibilities, codify independence, strengthen legitimacy, and support more effective, transparent, and equity-driven civilian oversight.

As part of this modernization initiative, the Village should revise the CPOC’s enabling ordinance to establish a clear and equity-focused mission statement that articulates the committee’s purpose, delineates its scope of authority, and affirms its role in conducting systemic oversight. The ordinance should codify the CPOC’s authority to review both internal and external complaints, participate in the intake process, evaluate the use of police surveillance technologies and community concerns, and issue formal policy recommendations. The Village should also consider the items that are no longer being practiced and whether they should be reinstituted or removed from the Procedural Rules to reflect the Village’s current strategic intent and practices. To ensure legitimacy and broad-based support, the ordinance must be developed through a collaborative process that incorporates input from the police department, Village leadership, CPOC members, and the community.

At the same time, the CPOC’s Procedural Rules should be comprehensively updated to reflect the committee’s expanded responsibilities and operational needs. These updates should incorporate oversight of systemic policing issues and surveillance technologies, align operational timelines and complaint intake procedures with effective practices, and formalize required training standards for members. The CPOC also has a Board Liaison, a Trustee assigned to the CPOC who is the touchpoint with the Village Board. The Procedural Rules should clarify the role of the liaison in CPOC meetings to ensure the independence for the decision making of the CPOC yet still enable the CPOC’s access to



Phase 4: Findings & Recommendations Development

the board through the liaison on issues appropriate for the Board. Additionally, the rules should embed clear expectations for transparency and accountability in how complaints are processed and reviewed, ensuring that the CPOC's practices are consistent, informed, and responsive to the evolving needs of Oak Park's civilian oversight framework.

Additional revisions to the Procedural Rules should ensure that previously authorized but inconsistently implemented practices are enforced, clarified, and modernized. These include:

1. Requiring that investigation reports include the original complaint form, supporting documentation, progress reports, and materials such as recorded interviews, police reports, body-worn camera footage, and the officer's disciplinary history.
2. Revise and remove the annual report from the Village Manager to the CPOC summarizing all resolved department member complaints, and replace it with an invitation to attend and brief the CPOC on an annual basis, or as necessary, on topics of community or CPOC concern.
3. Determine whether the Human Resources Director provides semiannual, anonymized demographic data on applicants, including race, sex, and age, at each stage of the police hiring process is necessary, given current practices.
4. Requiring the Police Chief to submit an annual report to the CPOC that details promotion eligibility, application and test results, and promotion outcomes by race, sex, age, rank, and years of service.
5. Enabling the CPOC to investigate or review systemic issues, such as patterns of racial or gender-based discrimination, when identified or referred.
6. Ensuring the CPOC's semiannual reports to the Village Board summarize complaint intake, referral, and processing activity for both citizen and departmental complaints.
7. Enforcing clear timelines for investigations: informal investigations should be completed within 60 days, and formal investigations within 120 days. When these timeframes cannot be met, the Police Chief should provide a written explanation.
8. Updating redaction and confidentiality protocols: because the CPOC will often know complainants' identities during intake, redactions should be replaced by anonymized descriptors when necessary to maintain context and confidentiality.
9. Incorporating mandatory training requirements for all CPOC members, including onboarding within the first three months of appointment and annual refresher training thereafter. This should include education on legal frameworks, police procedures, internal investigations, equity, cultural competency, and oversight best practices.



Phase 4: Findings & Recommendations Development

By aligning the ordinance and Procedural Rules through this unified reform effort, the Village will ensure consistency between governing documents and day-to-day operations, reinforce the authority and influence of the CPOC, and demonstrate a sustained commitment to modern, effective, and community-centered public safety oversight.

2. Expand the CPOC's Authority and Scope in Complaint Oversight

Recommendation 3. Pivot recommends that the Village expand the CPOC's authority and operational framework to support robust, end-to-end complaint oversight and enable proactive, evidence-based evaluation of systemic policing practices. This reform will allow the CPOC to fulfill its chartered mandate more effectively by bridging the gap between individual complaint review and broader institutional accountability.

Comprehensive Complaint Oversight. The CPOC should be empowered to oversee both internal and external complaints as authorized under the Village Code and Procedural Rules. This includes actively participating in the complaint intake process, receiving timely notice of new complaints, and ensuring equitable treatment for all individuals, whether community members or department personnel. The CPOC should have full access to complete investigative case files of external complaints, including complaint forms, supporting documentation, and unredacted BWC footage in advance of meetings.

While the CPOC does not need access to every internal complaint, refer to Finding 15, the committee should be granted visibility to internal complaints that impact the community and to provide insight into officer-to-officer relations, consistency in disciplinary standards, and overall trends in department accountability. This can be accomplished by providing the CPOC a high-level list or summary of internal complaints related to matters of community concern such as, but not limited to, an officer displayed bias or acted inappropriately with a member of the public and a community complaint was not filed, an officer used inappropriate or excessive force, or an officer's response to a call for service was inadequate. CPOC members can request additional information and select which complaints to review further when they notice trends they may want to research and make recommendations.

To preserve neutrality and efficiency, independent CPOC staff should be responsible for reviewing case materials, preparing summaries, and briefing committee members to ensure neutral, efficient, and well-informed deliberations. This approach maintains oversight integrity while respecting operational practicality and privacy concerns.



Phase 4: Findings & Recommendations Development

Authority to Recommend Further Investigation. The CPOC should be authorized to recommend additional investigation when specific, articulable evidence supports doing so. If the CPOC feels a complaint investigation was insufficient and additional information may impact the outcome, they may request further investigation of the matter to the Chief of Police. The CPOC should specify in writing the investigative steps missing. The Chief of Police will make a written determination on the matter. If the CPOC is still unsatisfied, they may appeal the matter to the Village Manager whose determination will be final.

Complaint Appeal. Should a complainant be dissatisfied with the outcome of a complaint investigation and they provide probative and material evidence that was not considered in the initial investigation, they can appeal the finding to the CPOC. After review, if the CPOC agrees, the CPOC can forward the appeal to the Village Manager's office and request a formal review. The Village Manager's determination will be final.

Systemic and Evidence-Based Oversight. Beyond individual complaints, the Village should empower the CPOC to implement an evidence-based oversight framework that systematically evaluates the effectiveness, equity, and impact of OPPD policies, training programs, police surveillance technologies, and community concerns. These systemic reviews will be developed from information gathered through the complaint process, data analysis, and trends and/or incidents of community concerns on policing. This expanded role should include the development of clear oversight metrics, access to disaggregated data, and a structured, recurring review process designed to identify trends, gaps, and areas for improvement in broader public safety oversight such as crime trends, traffic and pedestrian stop data, use-of-force incidents, arrest demographics, and systemic performance metrics. Findings should be documented and reported publicly and should inform joint efforts with OPPD leadership to improve policing practices. The goal of any systemic review will be to inform police policies, practices, procedures and training to align OPPD with best and/or effective practices in policing.

Support and Structure for Implementation. To support this work, the CPOC should maintain independent analytical capacity and use structured documentation systems to share findings and track implementation timelines. The Village should formalize this authority in both ordinance and Procedural Rules to ensure continuity, transparency, and sustained impact.

This integrated oversight model will ensure that the CPOC is equipped to move beyond reactive case review toward a strategic role in shaping public safety policies, improving equity outcomes, and fostering public trust through accountable, data-driven governance.

Recommendation 4. Pivot recommends expanding the scope of the CPOC to include formal authority to review and provide guidance on the use of future proposed use of surveillance technology by OPPD through amending the Law Enforcement Surveillance Oversight ordinance.

The Village’s Law Enforcement Surveillance Oversight ordinance establishes a framework for public accountability and transparency regarding the acquisition and use of law enforcement monitoring and public safety tools, such as surveillance technologies. To further enhance community-centered oversight, the CPOC should be integrated as a formal partner in the review process. The CPOC should be included in the review of surveillance impact reports and proposed surveillance use policies before public hearings are conducted.

The CPOC should also be invited to offer input into the required Annual Surveillance Report and host or participate in public forums on the community impacts of these tools. Given its role for oversight of surveillance technologies such as automated license plate readers and its unique public safety mandate, the CPOC is well positioned to complement the technical perspective offered by the Civic Information Systems Commission with community-centered insight, especially regarding equity, civil liberties, and policing impacts.

3. Define “Special Items of Concern” to Disambiguate the Term

Recommendation 5. Pivot recommends formally defining “special items of concern” within the CPOC’s governing authorities.

Defining special items of concern will help to ensure proactive and responsive monitoring of significant policing issues that fall outside routine reporting or standard complaint review. While surveillance technology is the current topic of interest and the CPOC has gained some review authorities, the CPOC should have the ability to review emerging concerns the community may have. However, this can be difficult to predict.

“Special items of concern” should serve as the CPOC’s avenue to review and provide advisory input. These issues should be understood as significant, emergent, or systemic concerns related to police operations, policies, practices, or community impacts that merit focused attention and may require independent review, public engagement, or formal recommendations. In defining this category, it is important to strike a balance: the term should not be so vague or overly broad that it leads to ambiguity or overreach, nor



Phase 4: Findings & Recommendations Development

should it be so narrowly defined that it prevents the CPOC from addressing legitimate concerns that arise outside established processes.

“Special items of concern” should include, but not be limited to: (1) emerging complaint patterns or trends, such as repeated allegations of excessive force or disproportionate enforcement; (2) high-profile incidents that generate public concern, even absent formal complaints; (3) policy or practice issues—such as new technologies, surveillance tools, or tactical deployments—that may impact privacy, equity, or civil liberties; (4) issues raised by community members, organizations, or advocacy groups reflecting widespread concern; and (5) external findings or mandates from courts, civil rights bodies, or government agencies that require local oversight attention. When such an item is identified, the CPOC should submit a proposal to the Village Board of Trustees outlining the scope, rationale, and necessary resources for effective oversight. This framework ensures the committee remains aligned with the Village Board while effectively responding to the community’s needs.

Once the Village Board has requested the CPOC to look into a special item of concern, the CPOC should have broad authority to accomplish the task. Any disagreement regarding the CPOC’s scope of authority should be appealed through Village Legal to the Village Manager, whose decision will be final.

4. Strengthen Governance Through Formalized Procedures and Communication Protocols

Recommendation 6. Pivot recommends that the Village implement formal bylaws on the internal operations, communication protocols, and interagency relationships of the CPOC.

Implementing formal bylaws will strengthen procedural consistency, institutional legitimacy, and the committee’s influence in public safety oversight. By formalizing decision-making practices, communication standards, clear stakeholder roles and robust escalation and communication mechanisms, the CPOC will be better positioned to operate with transparency, effectiveness, and credibility across all stakeholder relationships.

Voting Procedures and Structured Recommendations. The CPOC should adopt clearly defined voting procedures to guide deliberations on whether an internal investigation was complete and objective, whether the findings were supported by evidence, and whether the case exposed broader training or policy deficiencies. The committee should also be



Phase 4: Findings & Recommendations Development

able to vote on commendations for exemplary conduct. The committee should also have the ability to conduct complaint deliberations in executive session without the presence of non-CPOC members, preserving the independence and confidentiality of its decision-making process. Subject matter experts and the Board Liaison may be present to answer questions from the CPOC but should be asked to leave the room once voting begins. CPOC staff will report the members' votes after the meeting. Following each vote, the CPOC's recommendations to the Police Chief should be issued in writing and be informed by effective practices and training. There should be a defined timeframe indicating whether the recommendation is accepted, partially accepted, or rejected, with supporting rationale and any follow up discussions. If disagreement persists, a protocol should be established to request the Village Manager, or designee to consider the matter.

Unified Internal Communications. To ensure that the CPOC speaks with a cohesive voice, all public reports, findings, and policy positions should be approved by a majority vote, while allowing documented dissenting views to be included in final communications. This structure will preserve the integrity of committee deliberations while enhancing public and institutional clarity. A vice-chair position should also be established to ensure leadership continuity and balanced representation.

Meeting Structure and Expectations. The CPOC should revise its meeting protocols to include clearly articulated expectations for member roles, standards of decorum, and participation responsibilities. These rules should be informed by the Ten Shared Principles endorsed by Illinois police leadership and aligned with professional standards for public deliberation.

Communication Channels with Key Stakeholders. To support transparency, alignment, and shared understanding, the Village should enhance and formalize communication channels between the CPOC, OPPD, and the Village Board. This may include establishing consistent touchpoints such as scheduled check-ins, and periodic feedback sessions. to ensure coordination between formal meetings and to maintain continuity in oversight activities. Formal communication should be in writing to create a record that can be tracked and followed up. Informal communication between the CPOC and the Village staff should primarily be through the CPOC staff member. Communication between the CPOC and the Board of Trustees should primarily be through the Board Liaison.

Additionally, collaboration between the CPOC, OPPD, and Village leadership on data-sharing strategies can ensure that information exchanges are both practical and aligned with oversight goals. More regular and intentional engagement will help promote mutual



Phase 4: Findings & Recommendations Development

understanding, enable timely issue resolution, and foster a cooperative environment that supports continuous improvement in public safety oversight.

Clarify Roles and Coordination Framework. To enhance transparency, consistency, and collaborative oversight, the Village should develop a standardized framework that clearly defines the roles, communication pathways, and expectations between the CPOC and Village entities with which it interacts. All communication between CPOC and stakeholders should be primarily facilitated by CPOC staff. However, there should be some interaction between the CPOC and the Police Chief. The CPOC and Police Chief should have a constructive relationship that can be achieved through the Police Chief's periodic scheduled attendance of the CPOC meetings. Outside of CPOC meetings, the Police Chief or a member of the CPOC may request a meeting through the CPOC staff member. The CPOC also has an assigned Trustee that serves as the Board Liaison. Communication between the CPOC and the Village Board should primarily go through the Board Liaison or through formal correspondence.

The framework should also clarify the responsibilities of the Village President, Trustees, Village Manager, and designated staff liaisons in supporting the CPOC's work. This includes guidance on reviewing reports, addressing systemic concerns, and facilitating information-sharing and meeting coordination. By clarifying these roles and workflows, the Village can reduce ambiguity, strengthen coordination, and support the CPOC in its role as a thoughtful, consistent, and constructive contributor to public safety governance and continuous improvement.

Issue Referral Process. The CPOC should establish an issue referral process for bringing matters to Village leadership for urgent or systemic oversight issues that arise outside the semiannual reporting cycle. This process would supplement not replace existing communication channels and help ensure emerging issues receive appropriate review. The process should include a defined criterion, documentation procedures, and a timeline for elevating concerns. By formalizing this pathway, the CPOC can strengthen its role as a proactive advisory body and foster more consistent collaboration with Village officials.

5. Strengthen Community Trust Through Public Engagement, Communication, and Recognition Initiatives

Recommendation 7. Pivot recommends that the Village enhance the visibility, accessibility, and community value of the CPOC by implementing a coordinated strategy centered on public engagement, education, communication, and recognition.



Phase 4: Findings & Recommendations Development

CPOC's communications and public engagement approach should follow a multi-pronged strategy implemented across both the short and intermediate phases of reform. In the short term, efforts should focus on establishing foundational tools to increase transparency and access to information. This includes enhancing the CPOC's webpage to feature educational materials, complaint summaries, and reports including annual reports in formats accessible to a wide audience. Additionally, the Village should launch a compliment program to create space for residents to recognize positive police interactions, and consider piloting a mediation program as an alternative pathway for resolving low-level complaints and building community trust.

6. Build CPOC Capacity Through Professional Staffing, Structured Training, and an Improved Appointment Process

Recommendation 8. Pivot recommends that the Village strengthen the CPOC's capacity, credibility, and long-term effectiveness by investing in professional staffing, implementing structured and recurring training for members, and reforming the appointment and onboarding process.

Dedicated staff role. To provide the necessary operational support, the Village should establish a dedicated staff role, such as a liaison, analyst, or administrative support. This position is distinct from the current staff liaison since the primary role of this position is to manage the day-to-day duties of the CPOC. The staff position would be tasked with coordinating complaint intake and tracking, agenda preparation, interdepartmental communication, public engagement, and potentially data analysis. It should be noted that any staff expansion is premised on the fact that they will receive access to all data and materials needed to perform their duties.

This new position should fit within the established Village government structure where every employee reports to the Village Manager but the CPOC should provide input on the scope of work. The Village should codify this support model to clarify the staff's authority and its relationship to the CPOC, ensuring consistency and continuity in operations.

To maintain a reputation of professional independence and objectivity, the primary responsibility of the staff position should be to aid the CPOC in carrying out its mission and to facilitate communication with the Village, police, and other stakeholders. Staff responsibilities should also include reviewing investigative materials, preparing case summaries, drafting recommendations and correspondence, and briefing CPOC members in advance of meetings, allowing the committee to focus on strategic oversight and informed deliberation. The staff also ensures continuity across transitions,



Phase 4: Findings & Recommendations Development

institutionalizes procedural consistency, and provides long-term data tracking and trend analysis to guide evidence-based oversight.

Develop mandatory training for CPOC members. In parallel, the Village should develop a mandatory training program for all CPOC members that ensures they are equipped to make informed and effective recommendations. Stakeholders are more likely to accept and act on the CPOC's recommendations when they are rooted in demonstrable expertise. Regular interaction with OPPD personnel as part of the training process will also help normalize collaboration, reduce misunderstandings, and ensure CPOC is grounded in police operational realities. This will also help CPOC members focus recommendations on first-hand experience while maintaining their independent role.

This program should include both comprehensive onboarding and annual refresher training for continuing members where investing the time to complete training is a condition of appointment. Core modules should address legal standards, complaint procedures, cultural competency, bias awareness, police operations, union contracts, civil rights, and principles of due process and equity. Beyond the core content, members should also be required to get hands-on exposure to police practices. Members should have the opportunity to tailor their exposure by selecting from a range of immersive learning experiences. This may include participation in police ride-alongs, training observation, participation in the Citizens' Police Academy, have OPPD trainers spend time with CPOC members, and engaging in joint retreats or collaborative workshops between the CPOC and OPPD. To stay current with evolving best practices, CPOC members should also be encouraged to attend national oversight trainings such as those provided by NACOLE.

Revise appointment process. Finally, the appointment process should be revised to consider the diversity, lived experience, and subject-matter expertise needed for effective oversight. The Village should develop formal eligibility criteria that emphasize impartiality, equity, and public accountability. A standardized vetting protocol should be implemented to support access to confidential materials, including training on legal obligations, redaction practices, and information security. A structured onboarding process should accompany all new appointments to ensure readiness from the outset.



Intermediate-Term Recommendations (6-18 months)

1. *Modernize Data Systems and Establish Structured Information Access to Support Effective Oversight*

Recommendation 9. Pivot recommends that the Village modernize OPPD’s data infrastructure and establish structured, consistent protocols for information access to enable timely, informed, and independent oversight by the CPOC.

Data informed processes are important to Oak Park collectively to the Village, OPPD, and the CPOC. Specifically, the CPOC can utilize data to make informed recommendations on topics that include but are not limited to crime trends, traffic and pedestrian stop data, use-of-force incidents, arrest demographics, and systemic performance metrics. While modernizing data pertains primarily to OPPD, outdated data systems was a prevalent topic of discussion with stakeholders and is a matter the Village has already begun work on implementing.

The Village has already begun upgrading OPPD’s outdated and manual data systems, but feedback from stakeholders was that the current data systems limit the CPOC’s ability to obtain disaggregated information, track complaint trends, and evaluate outcomes. These limitations have created delays and incomplete reporting that undermine oversight credibility. New systems should be capable of producing customizable reports, generating timely data on complaint types and resolutions, and supporting the development of trend dashboards that align with oversight objectives. Benchmarking from peer jurisdictions including Berkeley, CA; Burlington, VT; Cedar Rapids, IA; East Lansing, MI; and Cambridge, MA demonstrates that modernized systems, when paired with dedicated analytical support, significantly enhance oversight capabilities and reduce administrative burden on law enforcement agencies.

In parallel, the Village should establish formal data-sharing protocols that guarantee the CPOC full and timely access to all information in an internal investigation case that is legally permissible to share, relevant OPPD policies, procedures, collective bargaining agreements, and operational materials associated with oversight responsibilities. This includes access to investigative records, complaint documentation, and body-worn camera footage necessary to perform thorough case reviews. The Village’s Information Technology department should be consulted on how sensitive and confidential materials can be transmitted to CPOC members and/or staff. Alternatively, the files should be made available to CPOC members for viewing at Village Hall. Prior to providing CPOC members sensitive and confidential materials, members should be required to sign confidentiality



Phase 4: Findings & Recommendations Development

agreements. These protocols should clarify roles, timelines, and confidentiality safeguards to balance transparency with privacy and operational feasibility while reinforcing the independence of the CPOC's evaluative function.

By combining upgraded infrastructure with codified access procedures, Oak Park can equip the CPOC with the tools needed to conduct responsive, data-informed oversight and build a more transparent, accountable system of public safety governance.

2. Implement a Staff-Supported Complaint Review Process

The intermediate objectives build on the CPOC's expanded authority in complaint oversight by implementing a staff-supported complaint review system. A staff-supported complaint review system will significantly enhance the capacity, consistency, and credibility of the CPOC as discussed above. This professional infrastructure shifts the CPOC from reactive complaint review to proactive accountability and public engagement, ultimately fostering a stronger, more transparent, and more responsive oversight framework.

3. Implement Training for CPOC Members

Implementing ongoing training for CPOC members in the intermediate-term phase represents the operationalization of foundational work laid in the short-term phase, where the training program was first developed and structured. Specifically, this involves implementing the training program developed earlier, integrating it into the formal onboarding process for new members, and launching annual refreshers for continuing members. By embedding these trainings as a regular expectation of committee service, Oak Park can ensure that CPOC members are not only initially equipped to participate but are also consistently updated as laws, practices, and oversight needs evolve.

4. Increase Community Outreach

The CPOC should expand its presence through community-centered outreach efforts, including public forums, neighborhood listening sessions, and partnerships with local organizations. These activities would serve to deepen resident engagement, surface diverse perspectives, and strengthen accountability between the community and law enforcement. In turn, the CPOC can relay to the Village and OPPD the public's concerns gathered through outreach and follow up on the issues raised. The committee should also advise the Village on transparency efforts and help translate policing data and oversight activities into accessible, meaningful information for the public. These events should be



Phase 4: Findings & Recommendations Development

complemented by plain-language educational materials that explain the CPOC's purpose, complaint processes, confidentiality protections, and oversight limitations. This layered approach is designed to build sustained public trust, foster mutual understanding, and ensure that CPOC's oversight work is transparent, inclusive, and responsive to community needs.

Long-Term Recommendations (18+ months)

1. Sustainment of Civilian Oversight Reforms

This focuses on embedding and sustaining the CPOC's expanded role in oversight through systemic reforms and structural integration. This includes institutionalizing policy evaluation so that the CPOC becomes a standing voice in shaping police directives, especially those tied to use of force, equity, and surveillance technologies. It also involves deepening the committee's analytic purview to encompass trend analysis across the full complaint lifecycle, from intake to resolution, and equipping the committee to provide data-informed insights and recommendations that drive improvements at both the operational and policy level. In addition, long-term efforts will formalize CPOC's authority in ongoing surveillance technology review, ensuring proactive governance as tools evolve. These changes reflect a shift from reactive case review toward forward-looking, structural accountability.

2. Assess Oversight Functions

Recommendation 10. Pivot recommends that the Village implement a formal framework to assess the effectiveness and budget allocation of the CPOC's oversight functions on an ongoing basis.

CPOC evaluation framework. A high-functioning oversight body should not only meet its statutory mandates and timelines but also build public trust, community legitimacy, and systemic improvements in public safety. To measure and strengthen these outcomes, the CPOC should be evaluated using clearly defined criteria across several core areas: timeliness and completeness of its work, impact on police accountability and policy reform, transparency and fairness in process, independence in decision-making, and responsiveness to community feedback. One method of accomplishing this is through a peer review process.

This framework should incorporate quantitative metrics such as complaint resolution timelines, number of recommendations issued and adopted, and outreach participation,



Phase 4: Findings & Recommendations Development

as well as qualitative feedback from community members, Village staff, and police personnel. By regularly reviewing this data and using it to adjust strategies, the CPOC can continuously improve its operations and relevance. Embedding a culture of evaluation and improvement will not only strengthen the CPOC's effectiveness, but also demonstrate its value and integrity to the Oak Park community.

Annual budget review. As CPOC's scope and authority expand, likewise it's budget should be reviewed annually to ensure the committee has sufficient resources to achieve its mandate in an efficient manner. The majority of changes to the CPOC's budget would be in the form of hiring of a CPOC staff member. However, this will be the first time the CPOC will formally expand its role and function since its creation. An annual budget review will provide transparency, promote long-term planning, and allow the Village to align resource investments with expectations around accountability and community trust in public safety.

3. Establish a Process for Periodic Review and Continuous Improvement of the CPOC

Recommendation 11. Pivot recommends that the Village institutionalize a process for periodic assessment of the CPOC's structure, performance, and alignment with evolving community needs.

Consistent with BerryDunn's recommendations, the review process should focus on identifying structural gaps, procedural inefficiencies, and opportunities for expanded accountability, using both internal evaluations and community feedback. As public expectations around transparency, accountability, and civilian oversight of law enforcement continue to shift, it is essential that the CPOC remain responsive, relevant, and effective. These assessments should occur at regular intervals such as every 10 years and evaluate whether the committee's composition, authorities, procedures, and outcomes continue to serve the goals of fairness, equity, and public trust.

These reviews should inform updates to the CPOC's enabling ordinance, procedural rules, training requirements, and engagement strategies. By committing to a cycle of continuous improvement, the Village will ensure that the CPOC remains a strong and adaptive oversight body capable of meeting Oak Park's long-term public safety and governance goals.



Conclusion to Recommendations

Together, these recommendations present a realistic and forward-thinking strategies for strengthening civilian oversight in Oak Park. They respond to persistent gaps in structure, capacity, transparency, and community trust, while reinforcing the Village's commitment to fair and accountable public safety governance.

By implementing reforms across short-, intermediate-, and long-term phases, the Village can steadily build a more capable and trusted oversight system. From clarifying the CPOC's scope to investing in staff and data infrastructure, each step builds toward a sustainable model of independent oversight that is well-positioned to monitor trends, influence policy, and reflect community values.

Ultimately, success will depend on shared commitment across Village leadership, the Police Department, CPOC members, and the public. With clear timelines, strong collaboration, and a focus on systemic improvement, Oak Park can lead with a model of oversight that is transparent, equitable, and community-centered.

IV. Proposed Action Plans

To implement the recommended reforms effectively and ensure lasting improvements in Oak Park's civilian oversight that better align the CPOC with best practices, this plan of action is organized by implementation phase: short-term, intermediate-term, and long-term. This phased structure supports strategic sequencing, resource planning, and measurable progress toward a more accountable and community-centered oversight system. The plan draws directly from key findings and community-driven recommendations, emphasizing transparency, structure, and trust as central pillars of reform.

Central to the success of this phased strategy is a commitment from Village leadership to provide immediate interim guidance to both the CPOC and the police department. This interim direction will be critical to launching priority changes, managing expectations, and reinforcing legitimacy even as the formal governance framework is undergoing revision. A RACI table and Gantt chart are included to provide a visual timeline of the proposed action plan.



Short-Term Actions (0–6 months) - Launch Immediate Structural and Operational Reforms

1. **Interim Guidance and Governance Transition.** While formal updates to the ordinance and Procedural Rules are developed, the Village should issue interim guidance to the CPOC and OPPD. This guidance should clarify the CPOC’s interim authority, scope of work, and communication protocols—including written response expectations from the Police Chief, procedures for issue referral, and CPOC’s access to data. Early direction will ensure change begins immediately and help prevent delays tied to legislative timelines.
2. **Revise the Ordinance and Procedural Rules.** Initiate comprehensive revisions to the CPOC’s enabling ordinance and Procedural Rules to modernize the committee’s mission, clarify its authority over complaint intake and review, and formalize its ability to evaluate systemic issues, policies, and surveillance technologies. Revisions should include codified expectations for voting, communication, training, and documentation practices. Revisions should also include an annual review of resource and budget allocation for CPOC’s operations.
3. **Formalize Internal Procedures and Issue Referral Process.** Establish bylaws, meeting processes, clear voting criteria, decision-making procedures, structured written recommendations to the Police Chief, and a formal issue referral process for urgent or systemic issues. A vice-chair role should also be created to support leadership continuity and coordinated communications.
4. **Develop Job Description and Hire the CPOC Staff Position.** Create and fill a staff role, such as a staff liaison, analyst, or administrative support, with direct accountability to the CPOC. This position will manage case preparation, internal communication, interdepartmental coordination, and strategic analysis. Access to full investigative data and materials must be guaranteed.
5. **Initiate Public-Facing Transparency Measures.** Update the CPOC webpage to make CPOC widely available, clearly describe complaint processes, investigation timelines, and the committee’s role. Begin publishing complaint summaries modeled after peer jurisdictions such as Indianapolis and East Lansing.
6. **Develop Criteria for CPOC Member Training.** CPOC member training should include training that includes comprehensive onboarding and annual refresher modules covering topics such as due process, civil rights, complaint procedures, equity and bias awareness, administrative law, and best practices in civilian oversight. Training should also incorporate exposure to police operations through options like police ride-alongs, participation in the Citizens’ Police Academy,



Phase 4: Findings & Recommendations Development

structured workshops with OPPD trainers, or observation of department training sessions to ensure members are grounded in both policy and practice.

7. **Reform the CPOC Member Appointment Process.** Adopt publicly defined selection criteria to promote subject-matter expertise, impartiality, and community representation. Require structured onboarding and establish confidentiality safeguards that allow access to sensitive information while ensuring legal compliance.
8. **Pilot Compliment Program.** Develop and launch a pilot program for community-initiated officer compliments. The Village should also consider implementing a mediation program to resolve lower-level complaints. These programs will add constructive, non-adversarial pathways to the oversight system and promote restorative accountability.

Intermediate-Term Actions (6–18 months) – Expand Capacity, Infrastructure, and Community Interface

1. **Continue Modernizing Data Systems and Access Protocols.** Upgrade OPPD's data infrastructure to enable real-time, disaggregated, and case-linked reporting. Establish formal data-sharing protocols that ensure timely access to entire complaint files. These reforms will align with practices from cities like Berkeley, Burlington, Cedar Rapids, East Lansing, and Cambridge.
2. **Implement Staff Supported Complaint Review System.** Once staffing is in place, CPOC staff should be tasked with coordinating and overseeing the complaint intake process to ensure timely complaint submissions. This restores the CPOC's ability to receive and manage complaint intake, consistent with its mandate. To support complaint review, staff should coordinate access of the investigative file with CPOC members and OPPD, ensure all files are complete, review the materials and report to the CPOC, and draft any correspondence or recommendations on behalf of the CPOC.
3. **Implement Structured Training and Onboarding.** Operationalize the training program developed for all new and existing CPOC members that includes legal standards, equity principles, and exposure to police operations. Participation in programs such as ride-alongs, police academies, and national oversight trainings should be required or encouraged.
4. **Launch a Comprehensive Public Engagement Plan.** Develop and implement a sustained engagement strategy that includes regular forums, targeted outreach to



underserved populations, and educational efforts that explain oversight processes in plain language.

Long-Term Actions (18+ months) – Institutionalize Evaluation and Broaden Systemic Oversight

1. **Establish a Performance Evaluation Framework.** Develop a formal framework to assess the CPOC's budget allocation and effectiveness in meeting its mandate. The framework should include a quantitative and qualitative metrics such as resolution timelines, adoption of recommendations, and stakeholder feedback. A peer-review model may support this process.
2. **Institute Periodic Structural Review.** Every ten years, the Village should undertake a structured review of the CPOC's membership, authority, and operations. These reviews should be used to guide updates to the ordinance, Procedural Rules, training content, and public engagement strategies.
3. **Expand CPOC's Systemic Policy Oversight.** Empower the CPOC to proactively review police policies, training, comprehensive trend analysis across the full lifecycle of complaints, the capacity to issue data-informed recommendations, and surveillance technology adoption. The committee should be able to issue formal recommendations and receive structured feedback from OPPD and Village leadership. This function ensures oversight shifts from reactive review to strategic influence.



RACI Table – CPOC Oversight Implementation

Recommendation	CPOC	OPPD	VB	VA
Short-Term Actions (0–6 months)				
1. Interim Guidance and Governance Transition	C	I	A	R
2. Revise the Ordinance and Procedural Rules	C	C	A	R
3. Formalize Internal Procedures and Issue Referral Process	C	C	A	R
4. Develop Job Description and Hire CPOC Staff*	C/R	I	A	R
5. Initiate Public-Facing Transparency Measures*	A	C	I	R
6. Develop Structured Training and Onboarding*	R	C	A	C
7. Reform the Appointment Process*	C	C	A	R
8. Pilot Compliment Program*	A	I	C	R
Intermediate-Term Actions (6–18 months)				
1. Continue to Modernize Data Systems and Access Protocols	C	R	C	A/R
2. Reclaim the Complaint Intake Function*	C	R	A	I
3. Implement Structured Training and Onboarding	A	C	C	R
4. Launch a Comprehensive Engagement Plan*	A/R	C	I	C
Long-Term Actions (18+ months)				
1. Performance Evaluation of CPOC Effectiveness*	C	I	R	A
2. Institute Periodic Structural Review*	C	C	A	R
3. Expand CPOC’s Systemic Policy Oversight*	C	C	A	R

Legend

- R – Responsible: Executes the task
- A – Accountable: Owns the outcome
- C – Consulted: Provides input
- I – Informed: Receives updates
- Any combination of R, A, C, or I

Stakeholders

CPOC – Citizens Police Oversight Committee

OPPD – Oak Park Police Department

VB – Village Board

VA – Village Administration

* The public should be informed

Preliminary Implementation Roadmap for CPOC Oversight Reform

