

I would like to suggest that the CCC membership consider researching the civilian oversight structure in Seattle, WA. They utilize a body that has some similarities to the role the CCC might have in relation to the FPC and MPD.

In 1992 Seattle, Washington established a civilian auditor to independently review Seattle Police Department (SPD) internal investigations. In 2002 the City created a 3-part civilian oversight system, including an Office of Police Accountability (OPA), an OPA Auditor, and a 3-member OPA Review Board.¹ In 2017 this 3-part oversight system was overhauled, consisting of the already existing OPA, an Office of Inspector General for Public Safety (OIG) and a Community Police Commission (CPC).²

The OPA investigates all allegations of employee misconduct and recommends findings to the Chief of Police. Note that the allegations investigated are not only those from citizen complaints but internal complaints as well, thus the OPA functions somewhat as the SPD Internal Affairs Department. The management of OPA is comprised of civilians while the investigatory staff is comprised of SPD sergeants. The OPA Director is appointed by the Mayor and approved by the Council from a slate of up to 3 finalists identified by a search committee; on which CPC Commissioners shall constitute at least 25% of the committee. To strengthen the independence of the OPA, the Director may only be removed for cause. The OPA Director may appeal their dismissal to the Council. If no request for appeal is made, the Council shall vote to approve or reject the removal within 30 days.³

The CPC provides community input on policing and police reform to all city departments and officials. The CPC consists of 21 Commissioners; with 7 selected by the Mayor, 7 selected by the Council and 7 selected by the CPC itself. At least 2 CPC Commissioners must be members in good standing of the Washington State Bar Association, one must be a public defense representative, one a civil liberties law representative, one a Seattle Police Officer's Guild representative, and one a Seattle Police Management Association representative. An Office of the CPC is established to administer and manage the functions of the CPC, headed by an Executive Director appointed by the CPC using merit-based criteria, subject to confirmation by the Council. The CPC Executive Director hires and manages CPC staff and manages the CPC budget.⁴

The OIG conducts systemic performance audits and risk management reviews of both the SPD and the OPA. OIG audit and review areas may include anything that could compromise the public's trust in the criminal justice system, and may extend to other City departments and offices in areas related to policing and criminal justice. The Inspector General has unfettered access to SPD and OPA operations in order to perform their duties, including being on-scene at investigation of serious uses of force by SPD and at administrative reviews of those incidents. The OIG focus on systems distinguishes OIG from OPA, which primarily handles complaints against individual officers. The Inspector General is selected by the public safety committee from up to three finalists identified by a search committee. CPC Commissioners must constitute at least 25% of the search committee. The Council may only remove the Inspector General for cause, and the Inspector General may request a hearing on the cause for removal after which the Council shall vote to approve or reject the removal by two-thirds vote.⁵

¹ Seattle's Police Accountability system:

<https://www.seattle.gov/opa/about-us/seattle-police-accountability-system>

² City of Seattle Ordinance 125315:

https://www.seattle.gov/Documents/Departments/OPA/Legislation/2017AccountabilityOrdinance_052217.pdf

³ Seattle Office of Police Accountability 2018 Annual Report:

<https://www.seattle.gov/Documents/Departments/OPA/Reports/2018-Annual-Report.pdf>

⁴ City of Seattle Ordinance 125315, Subchapter III:

https://www.seattle.gov/Documents/Departments/OPA/Legislation/2017AccountabilityOrdinance_052217.pdf

⁵ About the Seattle Office of Inspector General:

<http://www.seattle.gov/oig/about>