

AUDIT REPORT



CITY OF OAKLAND
Office of the City Auditor

DATE: March 10, 2026

TO: Oakland Residents, Mayor Lee, Members of the City Council, City Attorney Richardson, City Administrator Johnson, and Police Commissioners

FROM: City Auditor Michael C. Houston, MPP, CIA

SUBJECT: **Audit of Oakland Police Oversight Agencies: The Oakland Police Commission, Community Police Review Agency, and Office of the Inspector General**

INTRODUCTION

Oakland voters have twice affirmed their commitment to civilian oversight of the Oakland Police Department (OPD) through Measures LL and S1.¹ These measures, respectively passed in 2016 and 2020, established three oversight bodies: the Police Commission (Commission), the Community Police Review Agency (CPRA), and the Office of the Inspector General (OIG).

The Office of the City Auditor (Office) has completed a performance audit of the Commission, CPRA, and the OIG in accordance with City Charter Section 604(a), which requires performance audits of the Commission and CPRA every three years. This audit follows a previous audit the Office conducted, and brings the Office current on its requirement, evaluating the progress of the Commission and CPRA in implementing previous audit recommendations, each oversight body's compliance with City Charter and Municipal Code mandates, and the effectiveness of their oversight functions.

BACKGROUND

The Oakland Police Department (OPD) has operated under federal oversight since 2003, after a civil rights lawsuit revealed widespread misconduct and failures in internal accountability mechanisms. The lawsuit

¹<https://www.oaklandca.gov/Public-Safety-Streets/Police/OPD-Policies-and-Resources/ODP-Policies/Learn-More-About-Measures-LL-and-S1>

resulted in a Negotiated Settlement Agreement (NSA) that required OPD to implement 52 reforms, referred to as “tasks.”² Since then, there have been ongoing changes to police oversight via voter resolutions and City Council ordinances, including an as-yet unpassed updated enabling ordinance for the OIG: In 2016, new scandals involving OPD—including a high-profile case that implicated multiple officers in the sexual exploitation of an underage victim—renewed public demand for accountability. In November 2016, Oakland voters approved Measure LL, which established: (i) a civilian Police Commission (Commission) to oversee Oakland Police Department’s policies and procedures, and (ii) the Community Police Review Agency (CPRA) to investigate complaints of police misconduct.

- In 2018, the Oakland City Council added Chapters 2.45 and 2.46 to the Oakland Municipal Code outlining the bodies’ duties and authorities.
- In November 2020, Oakland voters approved Measure S1, which amended Measure LL, expanding the independence, authority, and staffing of the Commission and CPRA. Measure S1 also established a new Office of the Inspector General (OIG) outside of the OPD to oversee OPD’s compliance with reforms mandated through the 2003 NSA.
- In 2022, a U.S. district judge ruled that OPD could enter a “one-year probationary period” after the court found that OPD had successfully implemented dozens of reform measures required by the NSA. In 2024, however, a federal judge extended OPD’s federal oversight after independent investigations uncovered the Department’s failure to comply with two NSA requirements related to its Internal Affairs Division’s (IAD) complaint procedures and disciplinary policies.
- In 2024, the City Council considered an ordinance to amend the Oakland Municipal Code and add Chapter 2.47, an updated enabling ordinance for the OIG. Proposed amendments included clarifying the Commission’s disciplinary authority and defining the OIG’s scope of work.

As of this report, OPD remains under federal oversight, and the City Council has not yet voted to adopt revisions to the enabling ordinance. Oversight staff from the OIG and CPRA reported in February 2025 that the second reading of the ordinance remains on hold pending further feedback from stakeholders.

Each of the Police Oversight Agencies Has a Distinct Role in Independent Oversight

Each of the police oversight agencies has a distinct role:

- **The Commission oversees OPD policies and procedures.** Under City Charter Section 604, the Commission oversees OPD’s policies, practices, and customs for adherence to national standards of constitutional policing. The Commission must consist of seven regular members and two alternate members, all of whom must be Oakland residents aged 18 or older. The Mayor appoints three regular

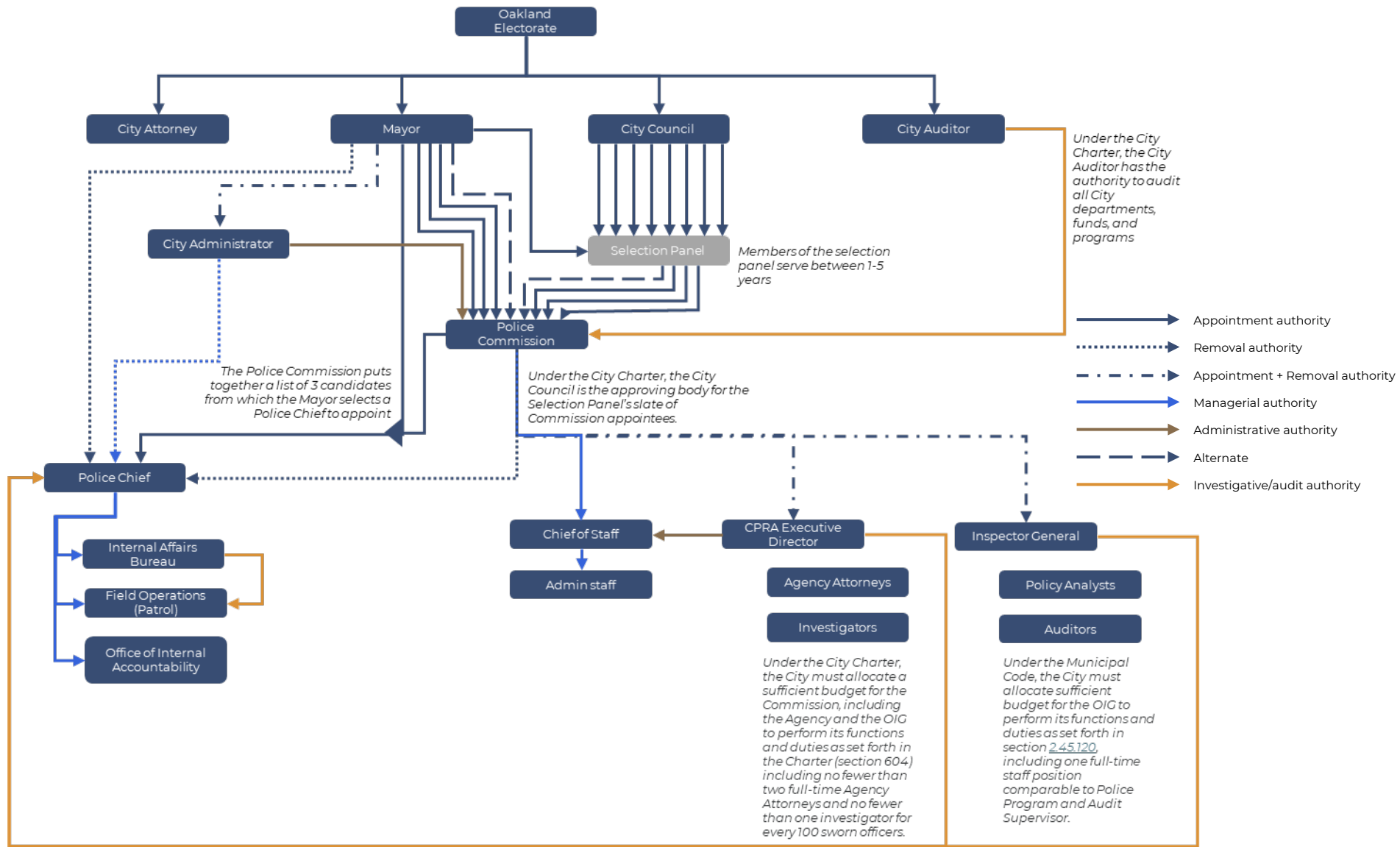
² The 52 tasks represent 51 items for reform and one “contractual housekeeping provision.” These are monitored by a court-appointed independent monitor. Effective 2010, a Memorandum of Understanding (MOU), approved by Judge Thelton E. Henderson, reduced the number of actively monitored tasks from 51 to 22. An Amended Memorandum of Understanding, effective 2012, further reduced the number of actively monitored tasks to 13. Since then, court orders have further reduced the number of actively monitored tasks. As of November 2025, the three outstanding tasks are Tasks 2, 5, and 45, which relate to the timeliness standards and compliance with internal affairs investigations, complaint procedures for internal investigations, and the consistency of OPD’s discipline policy. While the independent monitor continues to assess OPD’s compliance with Tasks 2, 5, and 45, the City Charter authorizes the Office of the Inspector General (OIG) to audit all 52 tasks to promote continued compliance, as continued compliance is a requirement of the MOUs.

commissioners and one alternate, subject to City Council confirmation. A selection panel composed of nine members – one appointed by each City Councilmember and one by the Mayor – selects the remaining four regular commissioners and one alternate commissioner for confirmation by the City Council. All commissioners serve in a volunteer and part-time capacity. The Commission has appointing authority for the Executive Director of CPRA and the head of the OIG, the Inspector General. By design, this structure is intended to enable independent oversight.

- **CPRA independently investigates complaints of police misconduct.** CPRA is an independent agency responsible for investigating public complaints involving use of force, in-custody deaths, profiling based on protected characteristics, untruthfulness, and assemblies protected by the First Amendment. CPRA is required to make all reasonable efforts to complete investigations within 180 days and no later than 250 days. Once CPRA completes its investigations, it issues written findings and proposes discipline to both the Chair of the Commission and the Chief of Police. If the Chief of Police agrees with CPRA’s findings and suggested discipline, the Chief notifies CPRA’s Executive Director who then notifies the Chair of the Commission. If the Chief of Police disagrees, the Chair of the Commission appoints a discipline committee, composed of three commissioners, to adjudicate the case and make a final determination.
- **The OIG monitors and audits police policies, practices, and procedures, particularly pertaining to NSA requirements.** The OIG is an independent civilian oversight agency that has the authority to monitor and audit OPD and CPRA policies, practices, and procedures. As an auditing body, the OIG has authority to issue reports with recommendations for how OPD can ensure compliance with a given NSA reform. The Inspector General – similar to the CPRA Executive Director – is classified as a department director and has authority to hire and fire OIG staff, pursuant to limitations described in City Charter Section 604(e)7. OIG staff, similar to CPRA staff, are all paid civil service employees. According to the City Charter Section 604(e), the Commission is responsible for hiring and supervising the Inspector General. The Commission also has authority to remove the Inspector General by an affirmative vote of at least five commissioners, only after adopting a finding or findings of cause. As the newest oversight agency in Oakland, the OIG began recruiting permanent staff in 2023.

Exhibit 1 shows the structure and relationship of the police oversight agencies.

Exhibit 1: The Police Commission is a Volunteer Oversight Body, Appointed by the Mayor and a Selection Panel, that Oversees Independent Police Oversight Agencies



Source: Auditor summary based on the City Charter, Municipal Code, budget, and classification specifications. For the purposes of this illustration, we define administrative authority as approvals over administrative items, such as staffing, budget, and timekeeping. We define managerial authority as program direction and supervision.

RESULTS

The audit found:

- The Commission and CPRA have not yet implemented all previous audit recommendations.
- The Commission, CPRA, and the OIG have met 26 of 43 select City Charter and Municipal Code requirements we tested.
- Vacancies, frozen positions, low minimum staffing requirements, and leadership turnover have hindered the police oversight agencies' ability to fulfill their legally mandated duties.
- The City Charter and Municipal Code are inconsistent and conflict on the hiring and removal of the heads of CPRA and the OIG.
- Structural independence would help to ensure the police oversight agencies have sufficient resources and administrative authority to meet their legal mandates.

Without sufficient resources, the police oversight agencies – the Commission, CPRA, and the OIG – have fallen short of their City Charter and Municipal Code requirements. The following sections of this report detail these findings.

The Police Commission and CPRA Have Not Yet Implemented All Previous Audit Recommendations

The previous audit report, published in June 2020,³ found that:

- the Commission's actions had not fully implemented requirements of the City Charter and the Municipal Code;
- the Commission's powers and duties needed clarification;
- CPRA had not fully implemented City Charter and Municipal Code requirements;
- CPRA's investigative processes were not formalized, and CPRA and the Commission had not adequately defined their oversight roles; and
- the City should pursue amendments to the City Charter and Municipal Code requirements.

The audit made 41 recommendations aimed at improving the Commission and CPRA based on these findings.

As of September 2025, 27 recommendations from our previous audit of the Commission and CPRA have been either closed or implemented. Fourteen (14) of the 41 audit recommendations remain open.⁴

³ See [Performance Audit of the Oakland Police Commission and the Community Police Review Agency](#), available on our website.

⁴ In November 2022, Oakland voters passed Measure X, which revised the City Charter to include, within the City Auditor's authority and duties, "submitting, at a public meeting of the full City Council, a semiannual report to the Council and public on the extent of implementation of recommendations for corrective actions made in the City Auditor's reports." To this end, our Office has and will continue to review and report on all open audit recommendations semiannually for periods ending June 30th and December 31st. We published the first audit recommendation follow-up report for the period through December 31, 2023 in March 2024. Since

- The Commission has implemented previous audit recommendations related to staffing, transparency, and public meeting procedures. For example, the Commission added a senior-level staff person to help establish its structure and priorities, developed policies and procedures for its operations and public meetings, and published annual reports summarizing its progress towards achieving its defined goals and objectives. Four recommendations to the Commission remain in process. Three of these recommendations rest on the formalization of a strategic plan to help the Commission outline the necessary activities to achieve its stated goals and objectives.
- CPRA has implemented prior audit recommendations related to case management processes, and supervisory oversight, and uses standardized investigation plans reviewed by supervisors, addressing a major gap identified in the 2020 audit. CPRA has also improved its investigative reporting by implementing a prior recommendation to standardize reports to ensure consistency in how investigations are conducted and reported. Nine recommendations to CPRA remain partially implemented. CPRA still needs to adopt formal policies and procedures for investigations, establish direct access to Internal Affairs files from OPD, and implement a formal agency-wide training program. Further, CPRA has not developed an outreach plan including goals and objectives, outreach activities, and monitoring reports to assess its progress in reaching its outreach goals. Fully implementing these recommendations is essential to furthering awareness, credibility, accessibility, and accountability for the Agency’s investigations of public complaints.

The semiannual Audit Recommendation Follow-up Report, most recently issued as of June 30, 2025, provide detailed summaries of the statuses of each of the open audit recommendations from the 2020 audit.

The Commission, CPRA, and the OIG Have Met Only 26 of 43 Select City Charter and Municipal Code Requirements

The Commission, CPRA, and the OIG are subject to numerous requirements outlined in the City Charter and Municipal Code. To assess each oversight agency’s compliance with distinct City Charter and Municipal Code mandates, this audit used a risk-based sampling methodology.⁵ Appendix A lists all the requirements identified for each oversight body, the requirements tested, and results.

As of the time of this audit, each oversight body is in partial compliance with its obligations under the City Charter and Municipal Code:

- The Police Commission was subject to 44 requirements and was in compliance with 20 out of 27 requirements we selected for testing.

then, we published three other recommendation follow-up reports for the periods through June 30, 2024 and December 31, 2024, respectively in October 2024 and March 2025, and most recently, for the period as of June 30, 2025, published in September 2025. The reports are accessible on the City Auditor’s website: <https://www.oaklandauditor.com/reports/all-reports/>.

⁵ We identified requirements by reviewing the language within the City Charter (Section 604) and Municipal Code (Sections 2.45 and 2.46). Requirements were generally indicated through prescriptive language such as “shall,” “must,” “at least,” or “no more,” though in some instances, we did not include contingent requirements or powers (e.g., “shall have the right to”). We judgmentally selected requirements for testing. Because the sample was judgmentally selected, we cannot project the results to the population.

- CPRA was subject to 23 requirements and was in compliance with 5 of 13 requirements we selected for testing.
- The OIG was subject to 5 requirements and was in compliance with 1 of 3 requirements we selected for testing.

Exhibit 2 below summarizes the select requirements with which each of the oversight agencies was either in compliance, in partial compliance, or not in compliance.

Exhibit 2: Each of the Police Oversight Agencies Were In Partial Compliance with Select City Charter and Municipal Code Requirements

	In Compliance	In Partial Compliance	Not in Compliance
Police Commission	Police attendance at hearings	Report to Mayor and City Council	Conduct performance reviews
	Receipt of Chief of Police reports	Full membership	
	Training requirements	Conduct performance reviews	
	Rules and procedures	Conduct performance reviews for CPRA Director and Police Chief	
	Conflict of interest	Agency oversight - case dismissals	
	Discipline committee	Budget item for NACOLE conference*	
	Review OPD training		
	Propose budget for OPD training		
	Form for performance reviews		
	Agency oversight - case prioritization		
	Public engagement - online reports		
	Mediation rules and procedures		
	OPD oversight		
	Public engagement - feedback		
	Contracts training		
Training for Discipline Committee			
Staffing			
Training			
Public hearings			
Annual reports			
CPRA	Conflict of interest	Investigation timeline (250 day requirement)	Staff to police ratio
	Public accessibility - online filing	Public accessibility - posted hours	Public accessibility - street-level office
	Videotape requirement	Training	Reporting duties
	Director duties	Rules and procedures	
	Background checks	Complaint assignment	
OIG	Training requirements		NSA task audits Reporting duties

Source: Auditor summary based on results of testing for compliance with select requirements of the City Charter and Municipal Code. Note: See Appendix A for an account of all the requirements and the audit team’s assessment of risk to inform testing.

*NACOLE is the National Association of Civilian Oversight of Law Enforcement

The partial compliance indicates challenges in the oversight agencies' ability to meet their objectives, institutionalize oversight practices, and ensure continuity over time. Noncompliance is driven by insufficient staffing due to vacant positions and low required minimum staffing levels, which have caused incomplete internal processes, as well as structural limitations in the City's oversight framework. While the Oakland City Charter and Municipal Code outline the functions and duties of each body, the police oversight bodies lack the resources necessary to meet those mandates. Addressing the deficiency in resources is difficult given the City's fiscal challenges, including ongoing suspension of required minimum staffing.⁶ Additionally, each body has experienced significant leadership turnover, contributing to delays and discontinuity.

Vacancies, Frozen Positions, Low Minimum Staffing Requirements, and Leadership Turnover Have Hindered the Police Oversight Agencies' Ability to Fulfill Their Legally Mandated Duties

Continued lack of compliance with legal mandates could weaken the public's confidence in the City's police oversight mechanisms, which voters approved citywide. As noted above, lack of staff has hindered the agencies' abilities to meet their extensive legal mandates:

- **The Police Commission has just one fulltime staff to support its 44+ legal mandates and oversight of two police oversight agencies.** As described in the Background section, the Commission is comprised of trained volunteers. The Chief of Staff works to ensure those volunteers receive Charter-required training and meet state and local open government requirements, maintains legal contracts, budgets, and all other administrative functions, such as public records compliance. The City Charter provides minimum staffing of "one fulltime civil service employee who shall report to the CPRA Executive Director and whose duties shall include providing administrative support to the Commission, and attending Commission meetings." The consolidation of strategic and administrative duties into a single position, however, creates a structural bottleneck that limits the Commission's capacity to institutionalize organizational processes and controls to fulfill its oversight obligations.
- **CPRA's investigator staffing is currently at 71 percent of its Charter requirement of one "line investigator" per 100 police officers, risking investigation timeliness.**⁷ The City Charter requires at least one line investigator for every 100 sworn OPD officers. As of January 2026, CPRA had five active investigators overseeing misconduct complaints against a department with over 600 sworn officers. This suggests a ratio of roughly one investigator per 133 sworn officers, falling short of the City Charter mandate. To comply with the ratio, CPRA would need to fill at least two more investigator positions, to meet the minimum for filled sworn positions and three more investigators for authorized sworn positions. Insufficient staff slows case resolution times and increases the likelihood that investigations will not be completed within the legally required timeframe of "reasonable effort" to complete within 180 days and no later than 250 days. Delays also harm the credibility of the review process, and prolong stress for both complainants and officers. Under California Government Code Section 3304, police misconduct investigations must complete within one year of the alleged misconduct to impose

⁶ On June 11, 2025, the City Council passed Resolution 90826, suspending the minimum staffing requirement for the agency attorneys for the Police Commission and CPRA, for the FY 2025-26/2026-27 Biennial Budget, due to extreme fiscal necessity.

⁷ These positions are budgeted. The FY 2025-26/2026-27 Adopted Biennial Budget cites a City Attorney opinion that finds the classifications of Complaint Investigator II and Complaint Investigator III fulfill the role of line investigators.

discipline, absent narrow exceptions. According to CPRA’s February 2025 forecast report, the agency’s average case closure time was 285 days. CPRA leadership reported that three cases in early 2025 came close to exceeding the statute of limitations, risking the inability to discipline officers even where allegations were sustained.

- **Since its creation in January 2022, the OIG has had limited filled auditor positions, inhibiting its ability to audit OPD’s compliance with the NSA tasks due to frozen and deleted audit positions.** The City Charter Section 604 requires the OIG to conduct audits and share the findings with both the Commission and City Council. Since 2022, the OIG has had three auditors on staff at various times, but has experienced turnover and attrition. The FY2025-26/2026-27 Proposed Biennial Budget deleted four frozen fulltime equivalent positions from the OIG’s staff of 8.0 FTE, including a policy analyst, an audit manager, and two performance auditors. The approved budget maintained these positions but kept them frozen. To mitigate the lack of audit staff,⁸ the Inspector General has conducted evaluations and inspections. The OIG has issued policy reviews and compliance evaluations that contribute to OPD oversight. The OIG has also engaged the public through public meetings and has participated in professional development workshops. Without sufficient staffing, however, the OIG cannot meet its central mandate to audit OPD’s compliance with court-mandated reforms, the broader evaluative function required by the City Charter. In December 2025, the OIG contracted with an audit firm to conduct audits of seven NSA tasks to determine compliance.

The City Charter and Municipal Code outline minimum staffing requirements for the police oversight agencies to preserve their ability to independently fulfill their responsibilities. However, as discussed later in this report, minimum staffing requirements are not sufficient to meet those responsibilities. According to City Charter 604(e), “The City shall allocate a sufficient budget for the Commission, including the Agency and the OIG, to perform its functions and duties as set forth in this Charter section 604...” Notwithstanding the declared extreme fiscal necessity, the obligations and expectations of the police oversight agencies cannot be met without sufficient resources.

Each agency has also experienced significant turnover in leadership since the 2020 audit, with the current Chief of Staff to the Police Commission, the CPRA Director, and Inspector General all having two years’ tenure or less. The Police Commission itself has also experienced turnover, vacancy, and below-minimum membership.

The City Charter and Municipal Code are Inconsistent and Conflict on Hiring and Removal of the Heads of CPRA and the OIG

During the audit we identified instances where the City Charter and Municipal Code conflict on police oversight and in which the consideration of agency directors is inconsistent:

⁸ Under Generally Accepted Government Auditing Standards, a person performing audits does not need to be an auditor by title. GAGAS 1.27 (f) defines auditor as: “An individual assigned to planning, directing, performing engagement procedures, or reporting on GAGAS engagements (including work on audits, attestation engagements, and reviews of financial statements) regardless of job title. Therefore, individuals who may have the title auditor, information technology auditor, analyst, practitioner, evaluator, inspector, or other similar titles are considered auditors under GAGAS.”

1. Municipal Code Section 2.45.110 states “the Commission, with the assistance of the City Administrator shall be responsible for hiring the first and all subsequent civilian Inspectors General.” This conflicts with City Charter Section 604(e)(6), which states the Commission has the power to fill vacancies.
2. Municipal Code Section 2.45.100(C) states “All OIG staff, including the Inspector General, shall be civil service employees in accordance with Article IX of the City Charter.” This conflicts with City Charter Section 604(e)(7), which states, “The staff of the Agency, OIG and Commission, *with the exception of the Agency Director and Inspector General themselves*, shall be civil service employees in accordance with Article IX of the City Charter” [emphasis added].
3. The City Charter Section 604(e) grants the Commission authority to terminate CPRA’s Executive Director by an affirmative vote of at least five commissioners. The City Charter does not indicate that a finding of cause is necessary to terminate the Executive Director. This varies from the termination requirements for the Inspector General, which requires adopting a finding or findings of cause, which may be defined by City Ordinance, under City Charter Section 604(e)(6).
4. Municipal Code 2.45.070(H) states that the Commission should, “Create a form for Commissioners to use in providing annual comments, observations and assessments to the City Administrator regarding the Inspector General’s job performance. Each Commissioner shall complete the form individually and submit his or her completed form to the City Administrator confidentially.” This represents a threat to the independence of the Inspector General. Having the Inspector General report functionally to the Police Commission ensures independence because the audit function is outside the reporting line of the entities under audit.

These conflicts have significant implications on the independence of the Inspector General and CPRA Executive Director, as described in the next section. These conflicts should be resolved, as most would have been with the adoption of the Chapter 2.47 amendments described in the Background section.

Structural Independence Would Help to Ensure the Police Oversight Agencies have Sufficient Resources and Administrative Authority to Meet their Legal Mandates

As described above, the Commission, CPRA, and the OIG have not, and are not able to fulfill their oversight roles and comply with their many specific requirements under the City Charter and Municipal Code. A review of existing requirements could identify if there are requirements that should be removed or consolidated, though considering changing some existing requirements would require voter approval.⁹

Whether or not the oversight agencies’ requirements are changed, the City needs to identify the budgetary resources, including staffing needs to effectively provide oversight of the OPD, and accordingly allocate the necessary resources. The oversight agencies also confront inherent conflict of interest in the City

⁹ This was also a recommendation of the 2020 audit, which found the City Council should consider changes to the City Charter and Municipal Code including to, “Reassess the Commission’s requirements from the City Charter and the Municipal Code to determine whether a Commission comprised of part-time volunteers can effectively address those requirements, or whether the City Council should eliminate requirements in the proposed City Charter amendment or in the Municipal Code.” This recommendation was considered implemented during the audit recommendation follow up cycle as of December 31, 2023, as members of the City Council had considered this recommendation in deliberating on the proposed language for Charter Amendment S1, which changed the power, duties, and staffing of the Oakland Police Commission, and created the Office of the Inspector General.

Administrator's role in proposing allocations of resources for police oversight agencies for the consideration of the Mayor and City Council. Particularly when budgets are tight, and minimum staffing provisions are suspended, there may be an incentive to cut oversight in favor of operations, especially as the police oversight agencies are entirely funded by the City's General Purpose Fund.

The City has budgeted all minimum staffing requirements for the agencies in the most recent budget cycle, which cut vacant positions in the Police Commission and OIG; however, these minimums do not appear to meet the needs of at least the Police Commission and Office of the Inspector General. Minimum staffing within the Municipal Code and City Charter for police oversight agencies require:

- **Police Commission:** "one full-time civil service employee who shall report to the Agency Director and whose duties shall include providing administrative support to the Commission, and attending Commission meetings,"¹⁰ ½ of a full-time equivalent administrative position "for the purpose of providing adequate administrative support for the Commission,"¹¹ and "the full-time equivalent non-City Attorney legal advisor position assigned by the City Attorney after consultation with the Chair [...] divided into two (2) part time positions: a one-half (½) or two-thirds (⅔) time position with specific responsibilities for providing legal services to the Agency related to investigations and discipline, and a one-half (½) or one-third (⅓) time position as legal advisor to the Commission."¹² The Commission has 1 FTE for administrative support and contracts legal counsel.
- **CPRA:** one line investigator "for every one hundred (100) sworn officers in the [Police] Department, rounded up or down to the nearest one hundred (100)," and no fewer than two full-time legal advisors for the Agency. The City Charter also requires at least one investigator to be a licensed attorney.¹³
- **OIG:** one full-time staff position comparable to the position of Police Program and Audit Supervisor, and one Policy Analyst position.¹⁴

The freezing of the OIG's audit positions does not meet the requirement within Municipal Code Section 2.45.100, which states:

The City shall allocate a sufficient budget for the OIG to perform its functions and duties as set forth in section 2.45.120, below, including budgeting one (1) full-time staff position comparable to the position of Police Program and Audit Supervisor..." [emphasis added].

While the budget added \$122,500 for "a qualified firm to conduct essential audits, evaluations, and reviews of OPD and CPRA," one audit manager cannot adequately meet the requirement of auditing 52 tasks within the NSA. For example, the City Auditor's Office received an independent legal opinion from the City Attorney's Office on the minimum staff required for the City Auditor's Office to perform its mandated duties without material impairment. The 2010 legal opinion concluded each auditor FTE would be expected to have 1,296.75

¹⁰ City Charter Section 604 (e)(5).

¹¹ Oakland Municipal Code 2.45.180(C)

¹² Oakland Municipal Code 2.45.180 (D).

¹³ City Charter Section 604(e)(4) and (e)(1).

¹⁴ Oakland Municipal Code 2.45.100(C) and (D).

work hours per year, and estimated 10,372 hours per year were needed to complete 17 legislative requirements at that time and estimated the minimum staffing threshold of 8.0 auditor FTEs.¹⁵

The deletion of the Police Commission's unfilled administrative analyst position to support the Chief of Staff may violate a similar requirement of the City Charter, Section 604 (e)(1):

The City shall allocate a sufficient budget for the Commission, including the Agency and the OIG, to perform its functions and duties as set forth in this Charter section 604, including ... [emphasis added].

One administrative staff person, the Chief of Staff position, appears insufficient for the support the Commission requires, especially given its extensive mandates, and the diversity and urgency of tasks required by the Charter and Municipal Code.¹⁶

CPRA is funded to the minimum staffing level but has experienced vacancies. This makes it difficult to determine sufficiency of the minimum staffing level.¹⁷ From 2017 through 2025, the vacancy rate among CPRA investigators has ranged from 22 percent to 56 percent, including frozen positions, and between 13 and 50 percent, not including frozen positions.¹⁸

Best practices and standards for independent audits and police oversight require those bodies to function without interference from the audited entity. The City Administrator's strong influence over the OIG's budget represents a structural threat to independence, as defined under Generally Accepted Government Auditing Standards, which the OIG intends to follow in addition to the Principles and Standards for Offices of Inspector General. Generally Accepted Government Auditing Standards define structural threats to independence as situations when auditors report to the entities they audit, and situations when the audited entities diminish audit offices' ability to conduct audits. The Principles and Standards for Offices of Inspector General also state that "the OIG should be funded through a mechanism that will provide adequate funding to perform its mission without subjecting it to internal or external impairments to its independence." NACOLE, the National Association of Civilian Oversight of Law Enforcement, similarly affirms the importance of independence for police oversight agencies. According to NACOLE, "One of the most important and defining concepts of civilian oversight of law enforcement is independence. In its broadest sense, it refers to an absence of real or

¹⁵ The [2010 legal opinion](#) is available on the City Attorney's website.

¹⁶ Municipal Code 2.45.180 states: "... the Commission shall provide the City Administrator with its proposal for the staff positions necessary to permit the Commission and the Agency to fulfill its functions and duties as set forth in this Chapter 2.45, Chapter 2.46, and as set forth in section 604 of the City Charter." While it does not appear that there was formal proposal by the Commission on behalf of the Commission and Agency, the Chair of the Police Commission issued a statement on the adequacy of funding for effective, legally mandated civilian police oversight that states, "we have reached the limit of possible reductions that will not imperil our fundamental effectiveness."

¹⁷ According to the National Association of Civilian Oversight of Law Enforcement's (NACOLE) report on *The Evolution and Growth of Civilian Oversight: Key Principles and Practices for Effectiveness and Sustainability*, budgets for police oversight generally do not exceed 0.5 percent of the overseen law enforcement agency's budget, though investigation-focused models, like that of CPRA, tend to be the most expensive forms of oversight and those budgets may exceed 1 percent of the police budget. Reviewing the most recent adopted budget, Oakland's police oversight budget is around 1.5 percent of the Police Department's budget, which is on par with NACOLE's survey findings.

¹⁸ This is a calculation based on positions authorized and filled, according to the first available monthly position control report, and represents an estimate as staffing levels fluctuate throughout the year.

perceived influence from law enforcement, political actors, and other special interests looking to affect the operations of the civilian oversight agency.”

Other structural independence issues include the inability of the agencies to hire staff without Administration approval, and requirements for the agency directors to consult with the City Administrator for approval in reorganizing their organizational structure, as described in City Charter Section 604(e)(6).

City leadership should act to ensure that our community is receiving quality and consistent police oversight. Specifically, in my opinion, the ongoing budget deficits and continued settlement agreement calls for critical examinations into the scale and scope of the oversight agencies’ roles and responsibilities, their budgetary resources, and their power to independently carry out their oversight function. Significant political and administrative capacity are needed to do this.

RECOMMENDATIONS

1. The City Attorney’s Office should provide an independent analysis of the resources needed – including staffing – to support the requirements of the police oversight agencies (the Police Commission, CPRA, and the OIG).
2. In conjunction with relevant stakeholders, including the Police Commission, the Community Policy Review Agency (CPRA), and the Office of the Inspector General (OIG), the City Council should develop and adopt revisions to the Municipal Code and pursue changes to the City Charter as needed, to resolve conflicts between the Municipal Code and the City Charter, namely in clarifying whether the Inspector General is a civil service position, removing language that requires Police Commissioners to submit performance appraisals of the Inspector General to the City Administrator, and considering whether a finding or findings of cause are needed to terminate CPRA’s Executive Director.

RESPONSES FROM THE POLICE COMMISSION, CITY ATTORNEY, AND CITY COUNCIL PRESIDENT JENKINS

Written responses from the Police Commission, City Attorney, and City Council President Kevin Jenkins are attached at the end of the report. Council President Jenkins did not provide a letter, but the response from his staff on Recommendation 2 is included in the implementation plan.

ACKNOWLEDGMENTS

I want to express our appreciation to the Police Commission and Chief of Staff to the Police Commission, the Community Police Review Agency, the Office of the Inspector General, and the City Attorney’s Office for their cooperation during this audit. I also want to acknowledge the staff who contributed to this audit, Performance Audit Manager Stephanie Noble and Assistant City Auditor Eduardo Luna. Last, I want to extend special thanks to Marie Warchol, who provided valuable research, objective perspective, and methodological rigor to this project as part of their capstone project through the Goldman School of Public Policy at the University of California, Berkeley.

STATEMENT OF COMPLIANCE WITH AUDITING STANDARDS

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. Government auditing standards require that auditors and audit organizations avoid situations that could lead reasonable and informed third parties to conclude that the auditors and audit organization are not independent and thus not capable of exercising objective and impartial judgment on all issues associated with conducting the engagement and reporting on the work (GAGAS 3.19). Standards also require that, when auditors do not comply with applicable GAGAS requirements because of law, regulation, scope limitations, restrictions on access to records, or other issues affecting the audit, the auditors should document the departure from the GAGAS requirements and the impact on the audit and on the auditors' conclusions (GAGAS 8.136). Our Office is required by Oakland City Charter Section 604 to complete an audit of the Oakland Police Commission, which oversees the Community Police Review Agency and Office of the Inspector General. During the course of this legally mandated audit, within the FY 2025-26 and 2026-27 Biennial Budget process, the Administration informally proposed to combine the Office of the Inspector General and the Office of the City Auditor to reduce redundancy. As this proposal directly related the audited entity and our own function, we believe this could lead a reasonable and informed third party to conclude that the auditors and audit organization were not independent or were not capable of exercising objective and impartial judgment on all issues associated with the engagement. This represents a threat of undue influence, that influences or pressures from sources external to the audit organization will affect an auditor's ability to make objective judgments (GAGAS 3.30(e)). While we cannot terminate this audit, due to legal requirements, we have disclosed the City Auditor's memo responding to this informal proposal as an appendix to this report. We followed all other audit standards to the best of our ability, and we believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

DISCLOSURE ON INDEPENDENCE

During the course of this audit, City officials began informal inquiries into the potential to house the OIG within the City Auditor's Office. In response, I issued a letter (dated June 26, 2025) outlining my position on those proposals to the Mayor, City Council, and City Attorney, and copied the Inspector General. That letter stated my neutrality on the merits of the proposal, but noted conflicts and resources required; namely, that the City Auditor must retain structural independence under Generally Accepted Government Auditing Standards, and cannot have staff reporting to another body, such as the Inspector General to the Police Commission, and that the City Auditor cannot audit its own operations. The two-page letter is provided in Appendix B.

OBJECTIVE AND SCOPE

The objectives of the audit were to assess the extent to which each oversight body is acting in accordance with its City Charter and Municipal Code requirements; identify obstacles, if any, each oversight body faces in meeting the requirements laid out in the City Charter and Municipal Code; and evaluate the extent to which the oversight bodies provide effective oversight of OPD.

The scope of the audit included activities of the Police Commission, CPRA, and OIG from January 2020 through December 2025.

METHODOLOGY

The objective of this audit was to review the City's police oversight agencies, as described above. To this end, we reviewed management controls relevant to the objective and assessed the activities, policies, and procedures of the Commission, CPRA, and the OIG through the following steps:

We reviewed relevant materials:

- Review of the Office of the City Auditor's June 2020 audit report, as well as the September 2025 audit recommendation follow-up report, to assess past findings and track progress.
- Analysis of the City Charter Section 604, Oakland Municipal Code Chapters 2.45 and 2.46, and the proposed ordinance to amend the Municipal Code and add Chapter 2.47.
- Review of civilian police-oversight standards, including NACOLE (National Association for Civilian Oversight of Law Enforcement) guidance on civilian oversight practices.
- Assessment of internal documents produced by the Commission, CPRA, and OIG, including annual reports, strategic planning documents, policies, contracts, and internal training records.

We conducted interviews and consulted with staff:

- Interviews with Commission staff, CPRA leadership and investigators, and OIG personnel to gather information on roles, internal controls, challenges, and practices.
- Observation of an in-person CPRA database training session to gain an understanding of CPRA's investigative database practices and challenges.

We tested for compliance:

- Application of a risk-based selection process to test a subset of City Charter and Municipal Code requirements relevant to each oversight body. Because this was a judgmental sample, the results cannot be projected back to the population.
- Review of compliance questionnaires shared with each oversight body.

We analyzed staffing and resource constraints:

- Analysis of staffing reports and vacancy data to assess capacity gaps and resource constraints across oversight bodies.
- Evaluation of the impact of staffing and frozen positions on each body's ability to fulfill its mandates.

APPENDIX A

Requirements of Police Oversight Agencies (the Police Commission, CPRA, and the OIG) with the City Auditor’s Consideration of Risk to Inform Testing for Compliance

To assess each oversight body’s compliance with its distinct City Charter and Municipal Code mandates, this audit used a risk-based sampling methodology. A targeted risk-based approach allowed the audit to focus resources on the most consequential legal obligations for each oversight body.

Table 1: Compliance Spreadsheet for Police Commission

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
1	City Charter Section 604(b)(2)	Public hearing	Conduct public hearings at least once a year on Department policies, rules, practices, customs, and General Orders	Low	Not tested	The Commission regularly posts public hearing meetings relating to Department practices on its website. The Police Commission meets the 2 nd and 4 th Thursday of each month.
2	City Charter Section 604(b)(7)	Budget review	Review the Mayor's proposed budget to determine whether budgetary allocations for the Department are aligned with the Department's policies, procedures, customs, and General Orders	Low	Not tested	The Commission has a public-facing Budget Ad Hoc Committee tasked with developing the Commission's budget proposal and reviewing the budget proposals of the CPRA, OIG, and Police Department, particularly regarding mental health resources.
3	City Charter Section 604(b)(7)	Public hearings - frequency	Conduct at least one public hearing on the Department budget per budget cycle and shall forward to the City Council any recommendations for change	Low	Not tested	The Commission's public hearing meeting minutes on its website.
4	City Charter Section 604(b)(8)	Police attendance at hearings	Require the Chief of Police or the Police Chief's designee to attend Commission meetings	Medium	Implemented	The Commission has a regular, recurring agenda item for Police Department updates. The Chief of Police or a designee attends the meetings.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
5	City Charter Section 604(b)(9)	Receipt of Chief of Police reports	Require the Chief of Police to submit an annual report to the Commission regarding such matters as the Commission shall require, including, but not limited to, a description of Department expenditures on community priorities as identified by the Commission.	Medium	Implemented	OPD posts annual reports online. Staff report OPD submits those to the Commission as well as requesting regular reports from the Chief using a template for data and information the Commission requires. The most recent OPD Annual Report posted is for 2022.OPD and Commission staff attribute the gap in reporting to turnover within the Chief role.
6	City Charter Section 604(b)(10)	Report to Mayor and City Council	Report at least once a year to the Mayor, the City Council, and to the public to the extent permissible by law, the information contained in the Chiefs report in addition to such other matters as are relevant to the functions and duties of the Commission.	Medium	Partially implemented	The Commission publishes an annual report on the work of the Commission. Staff report that they are working on a draft report to summarize Chief's reports, to be submitted to the Mayor and City Council.
7	City Charter Section 604(c)(1)	Chief of Police removal	If removing the Chief of Police, the Commission must follow certain requirements such as following a process for notification, substantiation, and documentation	Low	Not tested	Internal controls, involving independence structure of stakeholders, suggests this is lower risk.
8	City Charter Section 604(c)(1)	Full membership	Consist of 7 regular members and 2 alternate members who don't have certain conflicts of interest	High	Partially implemented	The Commission has ongoing vacancies. Current members do not appear to have conflicts listed within the City Charter.
9	City Charter Section 604(c)(9)	Training requirements	Receive orientation and training as required by ordinance	High	Implemented	Commission staff has worked to standardize required orientation on NeoGov, the City's employee training platform. Commissioners have received trainings as they have come onboard, but staff report there had been some delay with the transition to an eLearning system. As of December 2025, all Commissioners completed their trainings within NeoGov.
10	City Charter Section 604(d)(1)	Regular meeting cadence	Meet at least twice a month unless it deems one meeting is sufficient in a particular month	Low	Not tested	The Commission's website lists meeting dates that occur at least twice a month and demonstrate consistent compliance.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
11	City Charter Section 604(d)(1)	Public notice	Notify the public of the time and place of the meeting and provide time for public comment at each meeting	Low	Not tested	The Commission's website lists the location and time of its meetings that occur at least twice a month and demonstrate consistent compliance.
12	City Charter Section 604(d)(1)	Meeting location	Meet at least twice a year in locations other than City Hall	Low	Not tested	The Commission's 2023 Annual Report, the most recent at the time of audit initiation in January 2025, discussed meeting locations suggesting compliance with this requirement.
13	City Charter Section 604(d)(2)	Rules and procedures	Establish rules and procedures for the conduct and operations of its business	High	Implemented	The Police Commission Rules of Order are posted publicly on the Commission's website.
14	City Charter Section 604(e)(8)	Conflict of interest	No current or former sworn employee of the Department, or current official, employee or representative of an employee association representing sworn police officers, is eligible for any staff position in the Commission.	Medium	Implemented	No current Commissioners appear to have conflicts under this requirement. Staff report that the Selection Panel is responsible for ensuring appropriate vetting and eligibility for the Commission. The City Council confirms candidates.
15	City Charter Section 604(e)(6)	Conduct performance reviews	The Commission shall periodically conduct a performance review of the Agency Director and Inspector General.	Medium	Partially implemented	The Commission has established an ad hoc Staff Search/Evaluations Committee, tasked with meeting this requirement. Staff report that the Commission scheduled a closed session item for evaluation of the interim CPRA Director and that they initiated proceedings to conduct a performance evaluation of the Inspector General as of December 2025. Due to changes in leadership for the Police Department, OIG, and CPRA, staff report that the Commission has most recently been focused on interim leadership and recruitment searches.
16	City Charter Section 604(g)(2)	Discipline committee	In adjudications of Agency's findings and discipline, the Chair of the Commission shall appoint a Discipline Committee comprised of three Commissioners	Medium	Implemented	Each Commissioner must first complete Phase 1 of training upon appointment, after which they become eligible to serve on the Discipline Committee. Staff report that members rotate participation based on availability and that all current Commissioners have been trained.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
17	Municipal Code 2.45.050	Voting members	There shall not be more than seven (7) voting members of the Commission at any given time	Low	Not tested	Not tested, due in part to there being only seven Commissioners (with two vacancies) during the time of the audit.
18	Municipal Code 2.45.070 (A)	Retention policy	Maintain all electronic communications	Low	Not tested	Not tested due to breadth of scope. Commissioners have oaklandcommission.org email addresses managed by the City's IT Department.
19	Municipal Code 2.45.070 (B)	Confidentiality	Maintain confidentiality of its business in accordance with state and local law	Low	Not tested	Not tested due to breadth of scope. The Commission's Code of Conduct, which is part of Commissioners' orientation binder, includes a provision to maintain confidentiality unless expressly authorized by the Chair, the Commission's legal advisor, or a court order. The first phase of Commissioner training includes a module on confidentiality.
20	Municipal Code 2.45.070 (C)	Review OPD training	Review and comment on education and training the Department provides its sworn employees regarding certain topics pertaining to mental health	Medium	Implemented	Commission ad hoc committees, such as Racial Profiling, have discussed education and training. The reporting template for the Chief's regular reports also has an item on mental health training. Commissioner Farmer presented on Wellness Oversight & Community Building in a presentation dated September 11, 2025, as part of Suicide Prevention Awareness Month.
21	Municipal Code 2.45.070 (D)	Propose budget for OPD training	Prepare and deliver to the Mayor, City Administrator, and Chief by April 15 of each year or another date set by Mayor, a proposed budget for providing education and training the Department provides its sworn employees	Medium	Implemented	Staff report this is agendized annually. The Budget Ad Hoc Committee is responsible for reviewing Police Department budget proposals. Staff reported that the required public budget hearing was held late this year, on July 24, 2025.
22	Municipal Code 2.45.070 (E)	Chief of Police removal - finding of cause	If removing the Chief of Police, the Commission must define "cause" according to certain criteria	Low	Not tested	Internal controls, involving independence structure of stakeholders, suggests this is lower risk.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
23	Municipal Code 2.45.070 (F)	Receipt of Chief of Police reports	Notify the Chief regarding what information will be required in the Chief's annual report to the Commission which shall include certain topics listed in Municipal Code	Low	Not tested	The Municipal Code outlines topics for the Chief's report.
24	Municipal Code 2.45.070 (G)	Conduct performance reviews	Conduct an annual performance review of the Agency Director and of the Chief of Police	Medium	Not Implemented	There are no closed session reports of the Commission for performance reviews, though staff note that the development of performance criteria will assist them with evaluating a new Inspector General, CPRA Director, and Chief of Police.
25	Municipal Code 2.45.070 (G)	Conduct performance reviews for CPRA Director and Police Chief	Determine the criteria for evaluating the Agency Director's and the Chief's job performance, and communicate those performance criteria, in addition to any other job performance expectations, to the Agency Director and the Chief one (1) full year before conducting any evaluation of their job performance	Medium	Partially implemented	The Commission has drafted performance criteria and performance rubrics for the Inspector General and CPRA Director. Criteria for the Police Chief is in process as well.
26	Municipal Code 2.45.070 (H)	Form for performance reviews	Create a form for Commissioners to use in providing annual comments, observations and assessments to the City Administrator regarding the Inspector General's job performance. Each Commissioner shall complete the form individually and submit his or her completed form to the City Administrator confidentially.	Medium	Implemented	The Commission has drafted performance criteria and performance rubrics for the Inspector General and CPRA Director. It does not appear that Commissioners completed these forms for the Inspector General. As noted in the body of the report, Municipal Code 2.45.070 (H) conflicts with City Charter Section 604, which states the Inspector General shall be appointed by and reports to the Commission.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
27	Municipal Code 2.45.070 (I)	Request semi-annual reports from City Attorney	Request that the City Attorney submit semi-annual reports to the Commission and to City Council which shall include a listing and summary of certain topics.	Low	Not tested	The Municipal Code outlines topics for the City Attorney's reports.
28	Municipal Code 2.45.070 (J)	Agency oversight - case prioritization	Provide policy guidelines to the Agency Director for assistance in determining case prioritization	High	Implemented	Staff have formalized through policy a weekly meeting to provide the Agency Director assistance in determining case prioritization.
29	Municipal Code 2.45 (K)	Public engagement - online reports	Make certain materials available on public website (e.g., annual reports by each body)	High	Implemented	The annual reports of the Police Commission, CPRA, and OIG are publicly available online on their respective websites, which Commission staff have linked to the Commission's websites. Agency Director reports are regular agenda items. The Chief's annual report does not appear to be on the Police Commission's website, while there are annual reports on OPD's website, the most recent report is for 2022.
30	Municipal Code 2.45.070 (M)	Agency oversight - case dismissals	Review the Agency's dismissal and/or administrative closure of all complaints of misconduct involving Class I offenses	Medium	Partially implemented	Staff report this is an item under consideration by the CPRA & OIG Policies Ad Hoc Committee of the Commission, which is tasked with reviewing and establishing policies and procedures of CPRA, and that the policies are under review of the City Attorney's Office prior to implementation.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
31	Municipal Code 2.45.070 (N)	Mediation rules and procedures	Establish rules and procedures for the mediation and resolution of complaints of misconduct.	High	Implemented	The Commission voted to approve an amended mediation program on September 25, 2025. The amendments intended to clarify the scope, process, and administration of CPRA's mediation program.
32	Municipal Code 2.45.070 (P)	OPD oversight	Review and comment on the Department's policy and/or practice of publishing Department data sets and reports regarding various Department activities, submit its comments to the Chief, and request the Chief to consider its recommendations and respond to the comments in writing	Medium	Implemented	The Commission has provided the Police Chief with a data template for regular written reports.
33	Municipal Code 2.45.070 (Q)	Public engagement - feedback	Solicit and consider input from members of the public regarding the quality of their interactions with the Agency and the Commission	High	Implemented	Members of the public regularly speak and Commission meetings. Staff report that on occasion, the Commission issues surveys to solicit community feedback.
34	Municipal Code 2.45.070 (S)	Contracts training	Each commissioner must complete contract training before voting on a contract	Medium	Implemented	Commissioners are required to take training on Contracting Policies and Procedures within the second phase of their onboarding training.
35	Municipal Code 2.45.090 (A)	Public engagement - KTOP	Video recordings of all open sessions of Commission meetings shall be aired on KTOP-TV10	Low	Not tested	Meetings appear publicly accessible based on a review of the Commission's website.
36	Municipal Code 2.45.100 (A)	OIG oversight	Advise OIG of its priorities and functions and duties the Commission establishes for the OIG	Low	Not tested	The Commission has an ad hoc committee on CPRA & OIG Policies.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
37	Municipal Code 2.45.130 (A)	Training for Discipline Committee	Commissioners must complete orientation and other certain trainings (listed in 2.25.190) before sitting on a discipline committee	High	Implemented	Staff report that each Commissioner must first complete Phase 1 of training upon appointment, after which they become eligible to serve on the Discipline Committee. Staff report that members rotate participation based on availability and that all current Commissioners have been trained. Phase 1 training covers OPD operations, policies, procedures, the City Charter, due process, civil rights, ethics, confidentiality, the Brown Act, and Public Records Act.
38	Municipal Code 2.45.150	Approval for standing committees	Obtain City Council approval prior to the creation of any standing committee	Low	Not tested	The Commission only has ad hoc committees.
39	Municipal Code 2.45.150	Committees - cost consideration	Proposals to create a standing committee of the Commission must include information regarding the costs associated with staffing the standing committee	Low	Not tested	The Commission only has ad hoc committees.
40	Municipal Code 2.45.180 (A)	Staffing	Provide the City Administrator with its proposal for the staff positions necessary to permit the Commission and the Agency to fulfill its functions and duties as set forth in this Chapter 2.45, Chapter 2.46, and as set forth in section 604 of the City Charter	High	Implemented	The Commission has provided proposals for the staff positions required to support the functions of the Commission. The Chair of the Police Commission also issued a statement on <i>Adequate Funding for Effective, Legally Mandated Civilian Police Oversight</i> . The statement does not propose staff positions necessary, but notes cuts will imperil performance.
41	Municipal Code 2.45.190	Training	Within six months of appointment, or as soon thereafter as possible, each commissioner shall complete trainings outlined in Municipal Code Chapter 2.45.190	High	Implemented	Commission staff has worked to standardize required orientation on NeoGov, the City's employee training platform. Commissioners have received trainings as they have come onboard, but staff report there had been some delay with the transition to an eLearning system. As of December 2025, all Commissioners completed their trainings within NeoGov.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
42	Municipal Code 2.45.190 (M)	Budget item for NACOLE conference	Within the Commission's budget there shall be a line item for attendance at conferences offered by organizations such as the National Association for Civilian Oversight of Law Enforcement	Medium	Partially implemented	The FY 2025-27 Biennial Budget does not include a line item for attendance at conferences offered by organizations such as the National Association for Civilian Oversight of Law Enforcement. The Budget's summary of Measures LL and SI do not list the conference among required allocations. Staff report that this has been challenged by ongoing budget constraints, but at least some Commissioners are budgeted to attend.
43	Municipal Code 2.45.200	Public hearings	Determine the order and conduct of any public hearing	Medium	Implemented	The Commission has a Code of Conduct which includes responsibilities of the Chair, and Rules of Order, which includes a chapter on organization and meetings.
44	2.45.220	Annual reports	Submit annual reports to the Mayor, City Council, and the public.	High	Implemented	The Police Commission's website has publicly posted Annual Reports. Staff transmitted the most recent annual report to the Mayor's Office and City Council by email.

Table 2: Compliance Spreadsheet for CPRA

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
1	City Charter Section 604(e)(4)	Staff to police ratio	The staff of the Agency shall consist of no fewer than one line investigator for every one hundred (100) sworn officers in the Department, rounded up or down to the nearest one hundred (100).	Medium	Not Implemented	As of December 2025, CPRA leadership reports they have three 'field' investigators on staff. CPRA has been hiring for investigator positions. A staff of just three investigators, though, represents approximately one line investigator for every 212 sworn police, based on filled positions.
2	City Charter Section 604(e)(4)	Attorney requirement	At least one investigator shall be a licensed attorney.	Low	Not tested	This requirement has been waived under a declaration of extreme fiscal necessity. CPRA has two attorneys on staff.
3	City Charter Section 604(e)(7)	Background checks	Background checks shall be required for all Agency investigator applicants before they are hired by the Agency. Such background checks shall not be performed by the [Police] Department.	Low	Not tested	Internal controls through the HR hiring system suggest this is lower risk. The investigator class specification notes, as a requirement, that investigators must go through a thorough background check.
4	City Charter Section 604(e)(8)	Conflict of interest	No current or former sworn employee of the Department, or current official, employee or representative of an employee association representing sworn police officers, is eligible for any staff position in the Agency,	High	Implemented	Staff report this should be flagged during hiring pre-screening.
5	City Charter Section 604(f)(1)	Complaint intake	The Agency shall forward a copy of each complaint it receives to the Department within one business day of receipt, and the Department shall forward a copy of each complaint it receives to the Agency within one business day of receipt.	Low	Not tested	Not tested due to breadth of scope.
6	City Charter Section 604(f)(1)	Reporting duties to Police Commission	The Agency Director shall submit to the Commission each month a list of all investigations it is conducting	Low	Not tested	Police Commission agendas have regular reports from CPRA, listing investigations.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
7	City Charter Section 604(f)(3)	Investigation timeline (250 day requirement)	The Agency shall complete its investigations within two hundred and fifty (250) days of the filing of the complaint, with the Agency unless the Agency Director, in the Agency Director's discretion, makes a written finding that exceptional circumstances exist in a particular case that are beyond the Agency's control	High	Partially Implemented	CPRA retains a pending case list to track the dates cases were received. Given the shortage of staffing, however, it is difficult to ensure cases are completed within 250 days. CPRA has focused more on a 1-year goal, representing the statute of limitations for most cases. For cases completed in September 2025, 14 of 18 were completed within 250 days. Cases completed in September took a median of 176 days to complete, and all were completed within 365 days. There were not specific written findings of exceptional circumstances, but generally cases may exceed the 250-day goal due to complexity, for example, if there are a significant number of subject officers, witnesses, or allegations. Staff report they have newly implemented a 250-day form for investigators to complete, which will document the specific reasons for a case taking more than 250 days to complete.
8	City Charter Section 604(f)(3)	Investigation timeline (30 day requirement)	Within thirty (30) days of completion of the investigation, the Agency Director shall issue written findings and proposed discipline regarding the allegations stated in the complaint to the Chair of the Commission and the Chief of Police.	Medium	Not tested	Staff report the Director provides written findings and proposed discipline regarding all cases to the Chief of Police or his representative by email. Previously, notice of all written findings and discipline were provided to the Chair of the Police Commission through monthly reports. Now, staff copy the Chair of the Commission on the emails sent to the Chief advising about the disposition of cases.
9	City Charter Section 604(f)(3)	Investigation timeline (48-hour requirement)	The Agency Director shall issue written findings and proposed discipline within forty-eight (48) hours of completion of any investigation of Level 1 use of force (as defined by Department policy), sexual misconduct or untruthfulness.	Low	Not tested	

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
10	City Charter Section 604(f)(4)	Reporting duties to District Attorney	To the extent allowed by law and after consultation with the Commission, the Agency shall forward information to other enforcement agencies, including but not limited to the Alameda County District Attorney, when such information establishes a reasonable basis for believing that a crime may have been committed by a sworn Department employee	Low	Not tested	
11	City Charter Section 604(g)(2)	Adjudication procedures	Specific adjudication procedures spelled out in Section 604(g). E.g., if the Chief of Police agrees with the Agency's findings and proposed discipline, the Police Chief shall notify the Agency Director who shall notify the Chair of the Commission of the agreed-upon findings and proposed discipline. The Agency Director shall submit the Chief's findings and proposed discipline in addition to the Agency's findings and proposed discipline to the Chair of the Commission.	Low	Not tested	Internal controls involving multiple stakeholders suggests this is lower risk.
12	Municipal Code 2.46.020	Public accessibility - street-level office	Some of the Agency staff should be located in a street-level or ground-floor, visible office that is accessible by public transportation. The Commission, in consultation with the Agency Director, shall determine the number of existing Agency staff who would work at such a location.	Medium	Not Implemented	CPRA had intended to complete space renovations for its lease at the ground-floor space in 150 Frank Ogawa Plaza, in the old ProArts space, but experienced issues due to budget constraints. Staff report that this lease has been extinguished.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
13	Municipal Code 2.46.020	Public accessibility - posted hours	Hours of operation for this location shall be clearly posted on the office door and inside the office. The address of this office location, together with hours of operation and a telephone number shall be posted on the City's website and on the Agency's website	Medium	Partially Implemented	The CPRA website has the address, hours of operation, and telephone number for the 250 Frank Ogawa Plaza location posted. This office is not street-level.
14	Municipal Code 2.46.030 (A)	Complaint intake	Use the same complaint form as used by the Department in receiving all public complaints concerning alleged misconduct, including complaints from Department non-sworn employees. All complaints, wherever filed, shall be date-stamped and numbered sequentially. A copy of the numbered and date-stamped complaint shall be provided to the complainant and to the Department's Internal Affairs Division within one (1) business day of receipt.	Low	Not tested	Not tested due to breadth of scope.
15	Municipal Code 2.46.030 (B)	Public accessibility - online filing	Make complaint forms available to the public by posting the forms and information about the complaint process on the Agency's website and by accepting the online filing of complaints and attachments via the Agency's website, and by making information about the complaint process available at other public locations to be determined by the Agency Director.	High	Implemented	Information about the complaint process is posted online. There is a complaint portal online at https://apps.oaklandca.gov/cprapublic/Home.aspx .

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
16	Municipal Code 2.46.030 (C)	Training	Ensure that all investigators receive any necessary training in conducting fair and impartial investigations.	High	Partially Implemented	Staff report that investigators have received training, but that was not consistently documented prior to April 2025. Moving forward, staff anticipate bimonthly training, which will be logged.
17	Municipal Code 2.46.030 (E)	Videotape requirement	Videotape the interviews of all Subject Officers who are alleged to have committed a Class I offense	Medium	Implemented	Staff report that all subject officer interviews for Class I offenses are videotaped. Investigators have been instructed to take video recorders to all such interviews. For a sample of 10 random Class I allegations, staff had video recordings of interviews for two. The other cases did not require interviews due to other exculpatory video evidence (such as body worn camera or surveillance footage) that precluded the need to interview.
18	Municipal Code 2.46.030 (F)	Videotape requirement	Request, without requiring, that the complainant(s) and witnesses of Class I allegations agree to be audiotaped or videotaped if, in the Agency's discretion, its investigation would benefit from such taping	Medium	Not tested	Staff report that CPRA routinely video records all officer interview for Class I allegations and audio records all other officer interviews. For civilian witnesses, staff report that CPRA audio records all interviews upon securing permission from the witness. Investigators are informed of this practice.
19	Municipal Code 2.46.030 (G)	Rules and procedures	Establish rules and procedures for the operation of its business including, but not limited to, procedures for the intake of complaints	High	Partially Implemented	CPRA is still working to complete a manual. Full implementation has been delayed due to turnover in the Director.
20	Municipal Code 2.46.030 (H)	Reporting duties	No less than twice a year and as permitted by applicable law, issue a report to the Public Safety Committee which shall include certain specified information (e.g., number of complaints submitted to Agency, type of complaints, number of completed investigations, etc.)	Medium	Not Implemented	CPRA publicly reports on similar information to the Police Commission. There do not appear to be regular reports to the Public Safety Commission as required by 2.46.30 (H). Staff agree that it is not clear whether there had been similar biennial reports to the Public Safety Committee, but that they intend to do so on a go-forward basis.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
21	Municipal Code 2.46.040	Director duties	Agency Director fulfills responsibilities such as identifying staff positions, assigning complaints to investigators, reporting to Commission once a month regarding pending cases via a written report, etc.	Medium	Implemented	The Agency Director reports to the Commission and is responsible for day-to-day operations, including assigning staff to investigate complaints and monitoring the progress of investigations, monitoring CPRA's workload, and reporting to the Commission monthly on pending cases.
22	Municipal Code 2.46.050	Background checks	Background checks shall be performed on all new Agency Complaint Investigators and on the Agency Director	Medium	Implemented	Staff report this has been implemented and that the background checks are handled by Human Resources Management. The investigator class specification notes, as a requirement, that investigators must go through a thorough background check.
23	Municipal Code 2.46.060	Complaint assignment	Upon the agreement of the Chief, the Agency Director, the complainant(s) and the subject officer(s), the Agency Director shall appoint a qualified mediator with at least five (5) years of experience in mediating employment or other relevant disputes, from a conflict resolution company or association that employs mediators, to mediate a final resolution of the complaint in accordance with the Commission's established rules and procedures.	Medium	Partially Implemented	CPRA staff report they are working with the City Attorney's Office and OPD to initiate mediation. CPRA has selected a conflict resolution agency to mediate cases selected for conflict resolution, to be paid by a grant from Judicial Arbitration and Mediation Services.

Table 3: Compliance Spreadsheet for the OIG

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
1	City Charter Section 604 (f)(5)	NSA task audits	The OIG shall audit the Department's compliance with the fifty-two (52) tasks described in the Settlement Agreement in United States District Court case number C00-4599, Delphine Allen, et al., v. City of Oakland, et al., and make recommendations to the Department, the Commission, and the City Council based on its audit(s)	Medium	Not implemented	The OIG reports it has not been able to audit the tasks due to a lack of audit staff. However, the OIG has issued reviews and evaluations. As of December 2025, it has contracted with a firm to audit seven tasks.
2	City Charter Section 604 (f)(5)	Reporting duties	OIG shall provide written reports of the results of its audits to the Commission and the City Council, and, upon request, shall publicly report on the results of any audits to the Commission and/or the City Council in a manner consistent with all applicable confidentiality requirements.	Medium	Not implemented	The OIG reports it has not been able to audit the tasks due to a lack of audit staff. The OIG intends to provide written reports to the Commission and Council when its able.
3	City Charter Section 604 (f)(5)	Training requirements	The Inspector General shall receive orientation and training as required by Ordinance, including but not limited to orientation and training in the areas of Department operations, policies and procedures, including discipline procedures for police officer misconduct and failure to act, Procedural Justice, conflict resolution, national standards of constitutional policing, best practices for conducting investigations, and labor rights and laws.	High	Implemented	The Inspector General has received trainings and orientation that include police operations, trainings received by Police Commissioners, and trainings on best practices for investigations and audits.

#	Legal Reference	Shorthand Requirement	Requirement	Risk	Results	Comments
4	Municipal Code 2.45.80 (E)	Videotape recordings	The Commission and the OIG shall follow Department policies and procedures regarding the release of videotape and audio tape recordings of alleged Class 1 violations committed by police officers.	Medium	Not applicable	The OIG reports it has not released subject recordings.
5	Municipal Code 2.45.120 (H)	Confidentiality requirement	Any reports, plans, audits, reviews and recommendations generated by the OIG shall not disclose information in violation of state and local law regarding the confidentiality of personnel records, including but not limited to California Penal Code section 832.7	Low	Not tested	Internal controls, including required training, suggest this is lower risk.

APPENDIX B

City Auditor's June 26, 2025 letter to the Mayor, City Council, and City Attorney documenting his position on the informal inquiries into the potential of the City Auditor's Office to house the OIG within the City Auditor's Office.



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City Auditor

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June 26, 2025

Dear Mayor Lee, Councilmembers, and City Attorney Richardson,

In 2024, the City Council considered a proposal for the November 5, 2024 Municipal Election that aimed to “strengthen the independence of the Office of the Inspector General” by having the City Auditor appoint the Inspector General. More recently, during the 2025-26/2026-27 Biennial Budget process, an informal proposal emerged to combine the Office of the Inspector General and the Office of the City Auditor to reduce redundancy. The purpose of this letter is to formally state my position on these proposals and make clear how they would affect the Office of the City Auditor.

First, I am neutral on the merits of the above proposals. Second, any future proposals to alter the organizational structure of the *independent* Office of the City Auditor must consider the following:

- 1. The City Auditor must retain structural independence.** The City Auditor or staff of the Office of the City Auditor cannot report to the Police Commission. The City Auditor reports directly to and is accountable solely to Oakland residents. The City Charter ensures the City Auditor is structurally independent from the City Council, the Mayor, the City Administrator, and political appointees. Currently, the Inspector General is appointed by and reports to the Police Commission, which is made up of Mayoral appointees and appointees from a selection panel made up of appointees of the Mayor and the City Council. Furthermore, if the Inspector General and/or staff from the Inspector General’s Office were to report to the City Auditor and/or be absorbed into the Office of the City Auditor, the affected employees should report solely to the City Auditor, and not to anyone outside of the Office of the City Auditor. To avoid an inherent conflict between the duties of the City Auditor and the Inspector General, the City Charter section that established the Inspector General would need to be amended or revised.
- 2. Proposals must consider financial and staffing resources needed to comply with City Charter and Municipal Code mandates.** The City Charter and Municipal Code detail the

authority, responsibilities, and duties of the City Auditor and the Inspector General, as well as their respective offices. Proposals need to consider minimum staffing requirements already in place to enable the City Auditor and the Inspector General to fulfill existing mandates of these two officials' respective offices. For example, the City Charter establishes a minimum staffing level (via the passage of Measure X in 2022), of 14 fulltime equivalent positions for the Office of the City Auditor based on 2022 duties and responsibilities. If the Office of the City Auditor is to absorb additional responsibilities and duties, the Office will likely require increased funding for additional staff and operational capacity over and beyond the current minimum staffing level.

- 3. The City Auditor cannot audit their own operations.** The City Charter requires the Office of the City Auditor to adhere to the U.S. Comptroller General's Government Auditing Standards, which guide our Office to perform work that is consistently of the utmost quality, and preserves the Office's objectivity, independence, and competence. Government Auditing Standards prohibit auditors from conducting audits of their own operations. The Office of the City Auditor would not be able to audit the staff, duties, and responsibilities it absorbs from the Inspector General and/or the Office of the Inspector General.

Finally, please engage with me directly on any ideas or proposals that might impact me or my Office. My team and I are clearly affected by these matters and can offer valuable insights to how they may influence the City and its residents.

Thank you for your partnership in serving the City of Oakland, and for your attention to this matter. Please contact me if you have questions or would like to discuss these issues further.

Respectfully,



Michael Houston (Jun 26, 2025 16:23 PDT)

Michael C. Houston
City Auditor

cc: Zurvohn Maloof, Oakland Inspector General



OPC RESPONSE TO CITY AUDIT REPORT

February 2, 2026

To: City Auditor Michael C. Houston, MPP, CIA
Cc: Mayor Lee; Members of the City Council; Shawana Booker; City Attorney Richardson; City Administrator Johnson; Assistant City Administrator Phillips; Stephanie Noble; Antonio Lawson; Zurvohn Maloof; Katina Ancar
From: Chair Garcia-Acosta, Oakland Police Commission

Re: Oakland Police Commission Response to the Final Audit Report

The Oakland Police Commission (Commission) expresses its appreciation for the City Auditor's comprehensive assessment. The Commission offers the following responses and clarifications of the Final Audit Report's (Report's) findings and recommendations:

Throughout, the Report references the essential requirement for the Commission and its constituent parts (including the Community Police Review Agency (CPRA) and the Office of the Inspector General (OIG)) to maintain structural independence. Stating that independence is a prerequisite to the Commission's ability to ensure that its resources and administrative/governing authority are free from detrimental impairments, the Report expressly identifies such independence as essential to operational autonomy, the Report emphasizes the National Association of Civilian Oversight of Law Enforcement's (NACOLE's) admonition that independence is

[o]ne of the most important and defining concepts of civilian oversight of law enforcement In its broadest sense, it refers to an absence of real or perceived influence from law enforcement, political actors, and other special interests....

The Commission concurs that an oversight body cannot be “independent” if its operations are influenced by the entity subject to oversight (here, the Oakland Police Department), swayed by political concerns, or hindered by inadequate resources. To ensure effective oversight, the City must pursue all efforts to prevent the Commission from becoming a captive of law enforcement authorities.

To this end, the Report’s First Recommendation calls on the Oakland City Attorney to conduct an independent assessment of the Commission’s resources and staffing needs *without* Commission collaboration. For the purposes of defining its needs, the Commission does not view an analysis led by the City Attorney as “independent.” No basis exists to conclude that the City Attorney possesses information superior to that of the Commission and its Agencies concerning their own staffing and resource requirements. The City Attorney’s dual role advising the OPD (the law enforcement body subject to Commission oversight) creates a potential conflict of interest that could compromise the office’s ability to conduct an unbiased resource assessment. Therefore, any analysis conducted by the City Attorney cannot be considered independent. A genuinely objective resource assessment should be performed by a neutral party with civilian oversight experience in direct consultation with the Commission, CPRA, and OIG.

The Report confirms that vacancies, frozen positions, and below minimum staffing levels have hindered the Commission’s ability to implement some of its duties to the fullest extent. With regard to the Community Police Review Agency (CPRA or the Agency), the Report provides that the Agency’s investigators are currently staffed at 71% of their mandated requirement. The City Charter requires that CPRA have one (1) line investigator (Complaint Investigator II or “CI II”) for every 100 Oakland Police Department officers. Thus, at current levels, CPRA should employ seven (7) “Level II” Complaint Investigators. However, with current funding, CPRA has only been able to hire three (3) full-time CI II. Although CPRA also employs two (2) Supervisory Investigators (Complaint Investigators III), these two employees manage the line investigators and oversee case intake; they *do not* conduct investigations. As a result,

contrary to the Report's calculations, CPRA presently has only three (3) of the mandated seven (7) line investigators - or *just 43%* of Charter-mandated investigative staff. Consistent with the Report's findings about the dearth of resources available to the Commission (and the above clarifications), any proposed City Charter amendments beyond those eliminating express conflicts should significantly increase the Commission's finances to meet its responsibilities rather than diminish its oversight obligations to correspond to its inadequate funding.

As noted above, the Report identifies conflicts between the City Charter and Municipal Code affecting the Commission and suggests that Council adopt revisions to the Municipal Code and pursue Charter changes as needed (Second Recommendation). In particular, the Report recommends Municipal Code revisions to clarify the Inspector General's civil service status and reporting/termination provisions. The Commission believes the conflict is resolvable via Municipal Code revision without resort to the onerous Charter amendment process. Nonetheless, any Charter modifications beyond the Report's Second Recommendation must be informed by the needs of the Commission itself. The Commission's 2024 proposals to adjust its Enabling Ordinances serve as instructive guidance for eliminating confusion and improving the Commission's oversight effectiveness.

The Commission stands ready to collaborate on a process that centers independence, transparency, and sufficiency of resources to fulfill voters' mandates.

Sincerely,

Ricardo Garcia-Acosta

Ricardo Garcia-Acosta
Chair, Oakland Police Commission

CITY OF OAKLAND



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February 5, 2026

Michael Houston, City Auditor Office
of the City Auditor
One Frank H. Ogawa Plaza, 4th Floor
Oakland, California 94612

**Re: City Attorney's Response to Recommendation 1 of City Auditor's 2025
Audit of Oakland Police Oversight Agencies**

Dear City Auditor Houston:

The City Auditor's 2025 Audit of Oakland Police Oversight Agencies recommends that the City Attorney's office provide an independent analysis of the staffing resources needed by the Police Commission, Community Police Review Agency and the Office of Inspector General to meet the requirements placed on them by the City's Charter and Municipal Code. While our office would not conduct this type of analysis exclusively utilizing internal staff, we are capable of commissioning and managing such a study and have done so in the past on at least one occasion.¹

While our office is always fully occupied providing critical and time-sensitive legal advice, we recognize that a staffing study could benefit the City and we stand willing to help. If the City Council wants our office to administer a study to help inform the Council's budget decisions, and allocates sufficient funding to our office for us to engage outside expertise, we will assist.

To the extent the Police Commission believes that Oakland's police oversight agencies should directly contract for and manage a staffing study that will potentially benefit their own agencies and further reasons that doing so would decrease potential conflicts of interest and increase public confidence, we respectfully disagree. Even so, by no means do we insist that the City Attorney's office be tasked with managing a study. In sum, we sincerely thank the City Auditor's office for their work, and we await direction, if any, from the City Council.

Very truly yours,


RYAN RICHARDSON
City Attorney

cc: Mayor Barbara Lee
Members of the City Council
Jestin Johnson, City Administrator
Ricardo Acosta-Garcia, Police Commission Chair
Antonio Lawson, CPRA Director
Zurvohn Maloof, Inspector General

¹ In 2010 our office contracted with MGT consulting group to produce a study of the City Auditor's resource needs. <https://www.oaklandcityattorney.org/wp-content/oca-reports/public-legal-opinions-and-public-reports/2010-05-27-Legal-Opinion-2010.pdf>



Office of the City Auditor

Audit of Oakland Police Oversight Agencies: The Oakland Police Commission, Community Police Review Agency, and Office of the Inspector General

City Administration’s Recommendation Implementation Plan

Rec#	City Auditor’s Recommendations	Management Action Plan	Responsible Party	Target Date for Completion
1	The City Attorney’s Office should provide an independent analysis of the resources needed – including staffing – to support the requirements of the police oversight agencies (the Police Commission, Community Police Review Agency, and the Office of the Inspector General).	The City Attorney agrees with this recommendation. While our office is always fully occupied providing critical and time-sensitive legal advice, we recognize that a staffing study could benefit the City and we stand willing to help. If the City Council wants our office to administer a study to help inform the Council’s budget decisions, and allocates sufficient funding to our office for us to engage outside expertise, we will assist.	City Attorney’s Office	TBD, pending budget allocation
2	In conjunction with relevant stakeholders, including the Police Commission, the Community Police Review Agency (CPRA), and the Office of the Inspector General (OIG), the City Council should develop and adopt revisions to the Municipal Code and pursue changes to the City Charter as needed, to resolve conflicts between the Municipal Code and the City Charter, namely in clarifying whether the Inspector General is a civil service position, removing language that requires Police Commissioners to submit performance appraisals of the Inspector General to the City Administrator, and considering whether a finding or findings of cause are needed to terminate CPRA’s Executive Director.	Chapter 604 of the Oakland City Charter provides the most updated guidance regarding the referenced entities and supersedes any outdated language within the Oakland Municipal Code (OMC). As the City of Oakland is evaluating and assessing possible government restructuring through Charter change as this time, we are deferring any revisions referencing this section until any Charter changes adopted by the voters. The City Council will continue to monitor developments as it relates to Charter reform and make OMC revisions as necessary and in alignment with policy, procedure and government structure.	City Council	Deferred