



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION

*Principles for Effective Oversight National Association for Civilian Oversight of Law Enforcement
Standards & Practices: National Association for Civilian Oversight of Law Enforcement
Principles and Standards for Offices of Inspectors General*

TABLE OF CONTENTS

CHAPTER 1 ORGANIZATION AND GOVERNANCE	Page 2
Section 1	Authorization, Scope & Purpose Page 2
	Notice Page 2
	Authorization & Scope Page 2
	Background Page 3
	Mission Page 3
	Vision Page 3
Section 2	Administration Page 4
	Guiding Principles Page 4
	OIG Organization Chart Page 5
	Staff Roles and Duties Page 6
	On-Boarding & Orientation of New Staff Members Page 6
	Staff Competencies Page 6
	Quality Standards Page 6
	Training and Professional Development Page 7
CHAPTER 2 WRITTEN PRODUCTS	Page 7
Section 1	Work Products Page 7
	Provisions for Evaluations and Audits Page 8
Section 2	Surveys & Project Design Page 8
	Project Design Page 8
	Project Objectives Page 8
	Project Scope Page 9
	Methodology Page 9
	Evidence Page 9
	Sufficiency Page 9
	Appropriateness page 9
	Data Collection Methods Page 10
	Elements of a Finding Page 10
	Recommendations & Conclusions Page 11
	Recommendations Page 11
	Conclusions Page 11
	Audit Workflow Page 11



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

CHAPTER 1- ORGANIZATION AND GOVERNANCE

SECTION 1- AUTHORITY, SCOPE AND PURPOSE

Notice

This manual will serve as the guiding document for the daily operations of the City of Oakland's Office of the Inspector General (OIG). The City of Oakland Charter Section 604 and the Oakland Municipal Code Chapter 2.45 define the purpose, authority, and responsibilities of the OIG. This manual provides a framework for staff to fulfill the mission effectively and in compliance with applicable laws, policies, procedures, and national standards.¹ This Manual shall be considered a living document that can be revised as necessary to improve operations. OIG personnel are responsible for knowing and abiding by all policies outlined in this manual.

The Inspector General establishes policies and procedures for the OIG in accordance with the Oakland City Charter, the Oakland Municipal Code, laws, and national best practices. Only the Inspector General has the authority to issue, revise, or rescind a policy or procedure. All policies and procedures established by the Inspector General and accepted by the Police Commission are presumed to be in full force and effect until revised or rescinded. The OIG is committed to improving its operations and processes continuously. The OIG Manual is subject to review by OIG management, the Police Commission and employee Unions where necessary.

Authority & Scope

The OIG's primary charge is overseeing the city's compliance with the negotiated settlement agreement during federal oversight and after its conclusion. This responsibility includes monitoring Oakland Police Department's (OPD) compliance with policies, procedures, and laws. The presence of the OIG is intended to further strengthen the City's ability to identify systemic issues within the OPD and decrease instances of police misconduct, through accountability measures. This oversight also includes auditing and reviewing the Community Police Review Agency's (CPRA) processes, procedures, and work products for compliance with the City of Oakland Charter, Municipal Code, laws, and national best practices.

The OIG will drive best practices by recommending improvements to policies and training as well as engaging in collaborative initiatives that promote systemic advancements. The OIG will provide reports and recommendations to the Police Commission, City Council, and other action holders such as the Mayor or City Administrator. Action holders have the authority to accept or reject recommendations. Action

¹ The OIG used guidance from the National Civilian Oversight of Law Enforcement (NACOLE) and the Association of Inspectors General (AIG) to ensure national best practices are encompassed in this manual.



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

holders are responsible for ensuring the implementation of any accepted recommendation.² The OIG will also make public audit and evaluation reports and public synopses, in accordance with the laws, policies and applicable memorandum of understandings.

The OIG executes its responsibilities in a neutral, non-political environment free from interference from any person, group, or organization. The OIG is administratively, physically, and operationally independent from OPD and CPRA. The Inspector General, the agency head for the OIG, reports directly to the Police Commission.

Background

In 2016, residents of the City of Oakland voted to approve Measure LL. This measure established the Oakland Police Commission and charged it with overseeing the OPD's policies and procedures as they relate to constitutional policing, procedural justice, equity, and accountability. Measure LL also established the Community Police Review Agency as the independent oversight body primarily tasked with investigating complaints of police misconduct. Measure LL was codified as Oakland City Charter Section 604 and its subdivisions.³ In 2020, Measure S1 was passed to amend the City Charter and strengthen Oakland's police reform efforts. Measure S1 established an independent civilian OIG, which reports directly to the Police Commission.

Mission

The mission of the Office of the Inspector General is to be an independent, non-partisan oversight agency that will assist with increasing community trust and ensuring accountability in the Oakland Police Department. In its administration of duties, the Office of the Inspector General will implement a fair, thorough, and autonomous system of civilian oversight of law enforcement.

Vision

The Office of the Inspector General's vision is to build trust in civilian oversight of policing through encouraging, implementing, and preserving a culture of impartiality, transparency, and accountability.

² On occurrence, the action holder can be the department or agency being audited or reviewed.

³ Charter Section 604 can be reviewed at

https://library.municode.com/ca/oakland/codes/code_of_ordinances?nodeId=THCHOA_ARTVIADOR



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

SECTION 2- Administration

Guiding Principles

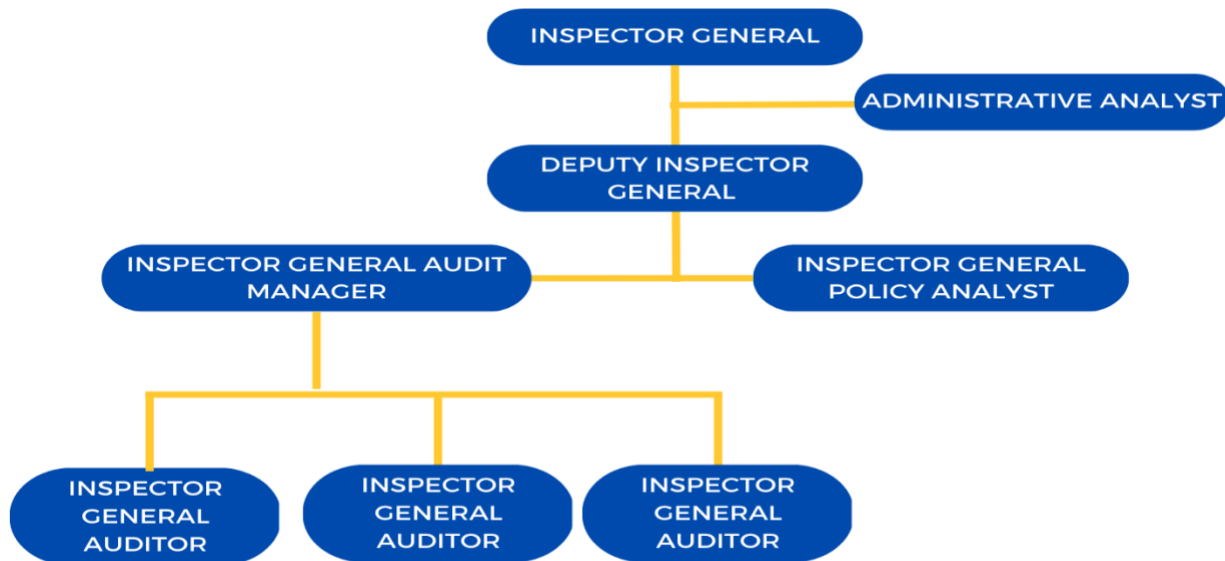
The following outlined principles shall guide and govern the work executed by the OIG. The OIG will, as an organization, assess all actions, decisions, and reports against these principles to ensure these principles meet the professional standards laid out by the Association of Inspectors General:

Accessibility	Present work in digestible and accessible formats to allow a broad range of community stakeholders to access OIG material, striving for content to be transparent, jargon-free, readable, and reasonably understood.
Collaborative	Build meaningful and cooperative working relationships; solicit and value the community’s perspective and expertise; work with system partners to advance accountability and improve OPD policies and training.
Communication	Maintain accessible, professional, and open communications with departments or agencies under inspection, evaluation, or review. Communicate in a professional, objective, respectful manner to the community.
Competence	Develop and maintain a high level of proficiency and excellence for the OIG duties and responsibilities.
Confidentiality	Protect information from improper or unlawful release, disclosure, or dissemination. This is specific to anonymous complainants and information reviewed for audits, evaluations, inspections or during the duties of the OIG, that is protected by law.
Cooperation	Value the diverse contributions of staff members, City employees, community organizations, residents, and stakeholders. Value clear and open internal communications.
Courage	Willingness and commitment to speak up and to inquire, to challenge assumptions notwithstanding opposition.
Ethical	At all times the actions of OIG employees should conform to high standards, abide by the law and be absent of moral turpitude.
Independence	Preserve the veracity of the OIG by maintaining the confidentiality of information and sources of information as required by law. Conduct OIG work with consistent application of facts, policies, and laws; maintain neutrality and exercise impartial judgment, and ensure all viewpoints are heard and respected.
Integrity	Be truthful and forthright in all OIG engagements, in both actions and communications, verbal as well as written.
Objectivity	Avoid conflicts of interest and bring attention to any situation that may cause, or appear to cause, a conflict of interest – including gathering and reporting data and information in a fair, unbiased manner.
Professional Development	Seek to improve our knowledge, skills, and abilities through training and relevant work experiences. Provide a stimulating and rewarding place to work.
Professionalism	Maintain the highest degree of decorum, internally and externally. Treat others fairly with respect and dignity. Be considerate, and respectful, and work to maintain a high level of credibility with management and the public.
Public Accountability	Complete all assigned tasks and perform those duties necessary to comply with policies, procedures, and appropriate professional standards. Make reports accessible to the public when possible.
Relevance	Focus on significant, timely, and useful information for the public, the Mayor, City management, City Council, and Police Commission.
Timeliness	Conduct audits, inspections, evaluations, and reviews promptly while recognizing the individual complexities of each project. Use a variety of reporting mechanisms to ensure the timely communication of urgent findings, including but not limited to reports, management alerts, advisories, notifications, information portal dashboards, and visualizations.
Transparency	Maintain honest and open communication with all stakeholders; communicate processes, reasoning, and conclusions; remain accountable to vision, mission, and values, both internally and externally.



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

OIG Organizational Chart (2022)



Staff Roles and Duties

The Inspector General – The Inspector General is responsible for the daily operation and management of the OIG. The Inspector General represents the OIG at meetings, reviews and approves all internal policies, procedures, and budgetary documents, for final City or Union approval. They assign and approve project priorities and deadlines in accordance with the City Charter and Municipal Code. They develop strategic plans and review and approve all work products prior to finalization and distribution. The Inspector General, with the assistance of management staff will conduct employee performance evaluations.

Deputy Inspector General– The Deputy Inspector General will act as the Inspector General in their absence. They manage the agency’s day to day fiscal/procurement duties and facility maintenance. They are responsible for overseeing the production of the OIG Annual Report. They are the liaison for internal stakeholders and provide human resources and budget support. The Deputy will be responsible for duties outlined in their job description and will report directly to the Inspector General.

Inspector General Program and Performance Audit Manager – The Inspector General Audit Manager is responsible for supervising a comprehensive audit, inspection, and evaluation program. They are responsible for supervising the work of auditors and policy analysts to ensure completeness, timeliness, and thoroughness of work products. They are the first-line supervisor who at times will assist in conducting high-profile or complex audits as needed. They will advise the Inspector General and Deputy Inspector General of any identified areas of risk. They will report directly to the Deputy Inspector General.



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

Inspector General Policy Analyst – The Policy Analyst is responsible for reviewing and analyzing relevant OPD, CPRA and, City of Oakland policies as they relate to audits, reviews, and evaluations. They will conduct policy and legislative research that will assist the OIG in any best practices policy recommendations. They will also assist where needed with reviews of closed Internal Affairs or CPRA investigations. The Policy Analyst will document all findings in a comprehensive report and under the guidance of supervision make recommendations in accordance with national best practices. They will report directly to the Deputy Inspector General.

Inspector General Program and Performance Auditor – The Auditor is responsible for conducting performance and program audits, reviews, inspections, and evaluations for OPD and CPRA, in accordance with the City Charter and at the direction of the Inspector General or designee. The Auditor will document all findings in a comprehensive report and under the guidance of supervision make recommendations in accordance with national best practices. They will report directly to the Inspector General Program and Performance Audit Manager.

The work of the OIG shall be conducted in a collaborative, team-based, and cross-disciplinary manner. All staff assigned to a project should constructively review, discuss, and take joint responsibility for the quality and substantive nature of the work product. This approach is intended to leverage the diverse skills, knowledge, training, and experiences of OIG staff. This method will result in a maximal benefit, productivity, and product integrity. While OIG management will supervise and guide processes and projects, the final approval lies with the Inspector General or their designee.

On-Boarding and Orientation of New Staff Members

All new staff members will be initially provided with comprehensive onboarding training, including OIG policies and procedures, a review of office manuals, and other information necessary to facilitate their orientation. New staff members shall attend the City of Oakland mandatory new employee orientation and training. Members of the management team and supervisors will be required to attend supervisor and management training provided by the City of Oakland. All staff will be required to attend training that is mandated by law during the onboarding process.

Staff Competencies

All OIG staff must demonstrate collective knowledge, skills, or experience in governmental accountability or compliance, procedural or social justice, and civilian oversight of law enforcement entities, or OIGs. Staff must have an awareness and consciousness of diversity, equity, and inclusion challenges across communities, especially historically neglected, underserved, and underrepresented communities. Staff must demonstrate professional integrity and conduct their work in an impartial manner. Each staff position



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

requires a different set of skills, education, and experience. Those minimum requirements and preferences are outlined in greater detail in the Inspector General series of job specifications and classifications.⁴

Quality Standards

This section identifies the quality standards, established by the Association of Inspectors General. Public office, such as the OIG, carries with it a responsibility to display the integrity necessary to maintain public trust. The OIG has a unique mission in government related to its responsibility and requires high standards of professionalism and veracity. These policies and procedures address independence, staff qualifications, planning, organizing, and other matters related to the operation and conduct of the OIG that align with those values.

All staff except administrative staff shall acquire a certification as a Certified Inspectors General Auditor or Certified Inspectors General Inspector/Evaluator within 18 months of hire. Staff shall meet the continuing professional education (CPE) requirements set forth by the AIG Green Book. The Green Book requires staff to complete at least 40 hours of CPE and training every two years. At least 12 of the 40 hours of CPE shall be completed in subjects directly related to the staff member's responsibility (i.e., inspections or evaluations), the government environment, or the specific environment on which the OIG focuses (e.g., public safety or policing oversight).

OIG Staff may be required to observe or take part in OPD processes (discipline and related meetings, review boards, shadowing staff, etc.) or trainings (e.g., crisis intervention, defensive tactics, firearms, crowd management, patrol tactics, etc.) to enhance their understanding of OPD processes and the implementation of OPD policy.

Continuing Training and Professional Development

The OIG supports the growth and continuous professional development of all staff. Supervisors will work with each direct report to implement a training plan and incorporate said plan into their performance evaluations. In consultation with their supervisor, staff shall identify potential learning opportunities that augment, and address the knowledge and skills needed to conduct their work.

CHAPTER 2- WRITTEN PRODUCTS

SECTION 1- Work Products

This section of the OIG procedures will outline the actual work. For an OIG, products and project deliverables are what ensure the public is aware of what deficiencies or areas of concern the office has discovered during projects such as evaluations, audits, or reviews. The published reports will outline types of evidence gathered for evaluation and analysis, findings, and recommendations concerning the target agency.

⁴ Job specifications and classifications for OIG staff can be viewed at <https://www.governmentjobs.com/careers/oaklandca/classspecs>



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

The OIG produces formal, public-facing products that can take a variety of forms, including but not limited to public synopses of reports, audit reports, white papers, and visualizations. In addition, the OIG shall issue and support the production of other public products, including an annual report to summarize the audits, evaluations, and reviews concluded during the prior fiscal year. All public products shall comply with OIG American Psychological Association (APA) style guidance including but not limited to the use of document templates.

Staff members may produce internal reports and products designed to enhance OIG's institutional knowledge of City operations. Such products may include but are not limited to descriptive reports, work papers, maps, data displays, training presentations, and instructions on how to locate or analyze information.

Provisions for Audit and Evaluation Projects

This section describes the general procedures for evaluations and audits. Staff shall plan and conduct projects with three overarching concepts in mind:

- Reasonable assurance: Staff shall ensure that they collect and test sufficient evidence and that the evidence is suitably related to the project objectives.
- Significance: Staff shall consider the relative importance of a matter (evidence, findings, background, community impact, etc.) in the context of the project objectives.
- Adaptability: Staff shall remain flexible and continually take steps to reduce the likelihood that they will fail to detect a mistake, inconsistency, significant error, or misconduct during fieldwork. Such steps may include obtaining additional peer or supervisory review, increasing the scope of the project, changing the elected methodology, or choosing another form of data analysis or review.

Most evaluations and reviews will have descriptive or evaluative qualities:

- Descriptive: Descriptive aspects of projects tell “what is” through the process of defining, explaining, and validating. These descriptive portions of projects shall not be used to determine cause and effect. Both qualitative and quantitative data may be used.
- Evaluative: Evaluative aspects of projects critically examine a program and its components through the collection and analysis of data about the program's activities, characteristics, and outcomes. Like descriptive aspects of projects, both qualitative and quantitative data can be used. Evaluative aspects of projects can be formative or summative and should seek to improve program design or implementation and demonstrate program impact.
 - Formative evaluations are conducted during program development and implementation and are to be used to determine how best to achieve goals or improve the program.
 - Summative evaluations should be completed once programs are established and fully implemented to determine the extent to which a program is achieving its intended goal.



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

SECTION 2- Surveys and Project Design

Survey

The OIG may conduct periodic opinion surveys of members of the public and OPD members to reflect on the different experiences with policing in Oakland. This information may inform the OIG’s audit and evaluation priorities. The results of the surveys will be analyzed, distributed, and reported publicly as determined by OIG management.

Project Design

The key to cohesive project design includes objectives, scope, and methodology. Each element is defined below:

Project Objectives are the specific questions that a project is intended to answer or a statement of what is intended to be accomplished. To ensure objectives are specific and can be answered, they should generally be framed as questions that can be answered with “yes”, “no”, or “to some extent” responses. To some extent, means in part and will require follow-up questions. For example, does the OIG have the resources it requires? Response: to some extent, the OIG has the funding it needs to operate however, the OIG does not have sufficient human capital currently to operate at full capacity.

Project Scope defines the boundaries of the project and is determined by the objectives. The scope identifies the subject matter, entity, problem, documents, time frame, and locations that the project will encompass. The scope is set at the beginning of a project but may be redefined as the work proceeds.

Methodology consists of the procedures used to gather and analyze evidence needed to address the objectives within the selected scope. The methodology should be specified to provide reasonable assurance that the evidence obtained is sufficient and appropriate to support the project’s findings and conclusions. The methodology shall also be designed to reduce the risk of incomplete, inaccurate, or unsound conclusions. The methodology is planned at the beginning of the project but can be refined as the project proceeds, as the team learns more about the available evidence, or as the team revises the project’s scope.

Evidence is the information needed to answer project objectives. The OIG will primarily use the following:

Staff shall collect evidence through a variety of means, including but not limited to observations, interviews, data, and document requests. When planning and conducting fieldwork, staff shall use methods that will yield sufficient and appropriate evidence to address the objectives.

Types of Evidence	Question to be answered
1. Physical	What is observed?
2. Documentary	What is produced in documents or written material?
3. Testimonial	What pertinent information was collected from interviews?



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

Sufficiency refers to the quantity of evidence. Staff shall judge whether sufficient evidence is gathered to inform a knowledgeable person that the project findings are reasonable. Sufficient and appropriate audit evidence means evidence that is sufficient, complete, relevant, and reliable enough to support the auditor’s findings. Project findings shall be based upon evidence sufficient to outweigh all counterbalancing evidence, very similar to the preponderance of the evidence standard in law. Staff shall actively seek, and the project report shall incorporate, any extenuating circumstances, reasonable management explanations, mitigating factors, or other pertinent information. Failure to consider or address all significant facts can lead to unsound conclusions, weaken credibility, or create the appearance that the OIG lacks objectivity.

Appropriateness refers to the quality of the evidence. As stated above, evidence may be obtained by observations, interviews, and data or document requests. All OIG projects shall be relevant, valid, and reliable. Evidence is relevant to the extent that it has a clear, logical, and important relationship to the issue being addressed. Evidence is valid if it is a meaningful and reasonable basis for measuring that which the project sets out to measure. Reliability is the consistency of results in measuring and testing information and shall be established by methods such as statistical testing and obtaining corroborating evidence.

Data Collection Methods

Appropriate data collection methods include, but are not limited to:

- Questionnaires, surveys, and checklists
- Interviews
- Document review
- Focus groups
- Field observations
- Ethnography and oral history
- Case studies
- Open-source research
- Social media information collection
- Review and analysis of departmental data
- Review of best practices

Elements of a Finding

Findings are factual conclusions based on the evidence that answers the project’s objectives. They collectively address the results (both positive and negative) of the project procedures and shall be supported by sufficient, appropriate evidence. The findings should be considered tentative until the IG has approved the final report. OIG staff shall use the following four elements to develop findings:

Elements of Finding	Question to answer	Explanation
Criteria	What should be?	Criteria are standards used to measure performance. They shall be objective and credible.
Condition	What is?	Condition is the existing situation as determined and documented during the project. A project evaluates conditions against criteria. The condition may be expressed as the extent to which the criteria are achieved.



OFFICE OF THE INSPECTOR GENERAL CITY OF OAKLAND POLICE COMMISSION STANDARD OPERATING PROCEDURES

Effect or potential effect	What is the impact?	Effect is the impact or consequences of the relationship between condition and criteria. It may be quantified as dollars or other units or maybe a logical expression of potential consequences (e.g., no actual deviation from established policy, but a risk to safety, civil liberties, or privacy was present). If criteria are being met, the effect is positive. The effect should answer the question “so what” and expresses the significance of the finding.
Cause	Why did it happen?	Cause is the explanation for why the condition occurred and is usually only pursued when the condition does not meet the criteria. Identifying the cause is important for determining what action is necessary to correct a problem, and thus what recommendations the OIG should make. There are usually two levels of cause: an immediate cause (e.g., someone made a mistake) and a root or management cause (e.g., lack of oversight or quality control procedures). Staff shall attempt to identify both levels of cause and make recommendations to address the root cause. It may be possible to identify causes through observation or analysis, but it is prudent to explore causes through interviews and confirm them with a department or agency’s management.
Recommendations	What should be done?	Recommendations are typically the inverse of the cause(s). When any evidence or element of a finding depends on communication from a department or agency, staff shall corroborate the information, preferably through written confirmation. For example, if a department explains the cause of a condition orally, it may be prudent to follow up the conversation with an e-mail to confirm and document our understanding. At a minimum, staff shall document critical information that was communicated orally in meeting notes.

Recommendations & Conclusions

Recommendations are suggestions or proposals as to the best course of action, especially one put forward by an authoritative body. Project teams shall develop recommendations to address any finding for which corrective action is suggested for OPD and CPRA. When developing recommendations, staff shall be alert to the threat of “self-review” (i.e., providing such specific and narrowly tailored recommendations that one could not in accordance with best practices and the principles of objectivity later return to assess the effectiveness of those measures) and the threat of “management participation” (i.e., taking on the role of management or otherwise performing management functions on behalf of the entity under evaluation or review). The recommendations given should provide general actions for remediation but cannot be so specific that, if implemented, the OIG would risk reviewing its work if it were to review the program again in the future. The recommendations shall not suggest a situation in which OIG would perform a management function of OPD or CPRA.

Conclusions are the overall answers to the project objectives. Report conclusions are logical inferences about the program based on the OIG’s findings, not merely a summary of the findings and they shall be included in the project report. During fieldwork, staff shall ensure that the evidence and information gathered will support findings that will address the project objectives.

Audit Process Workflow

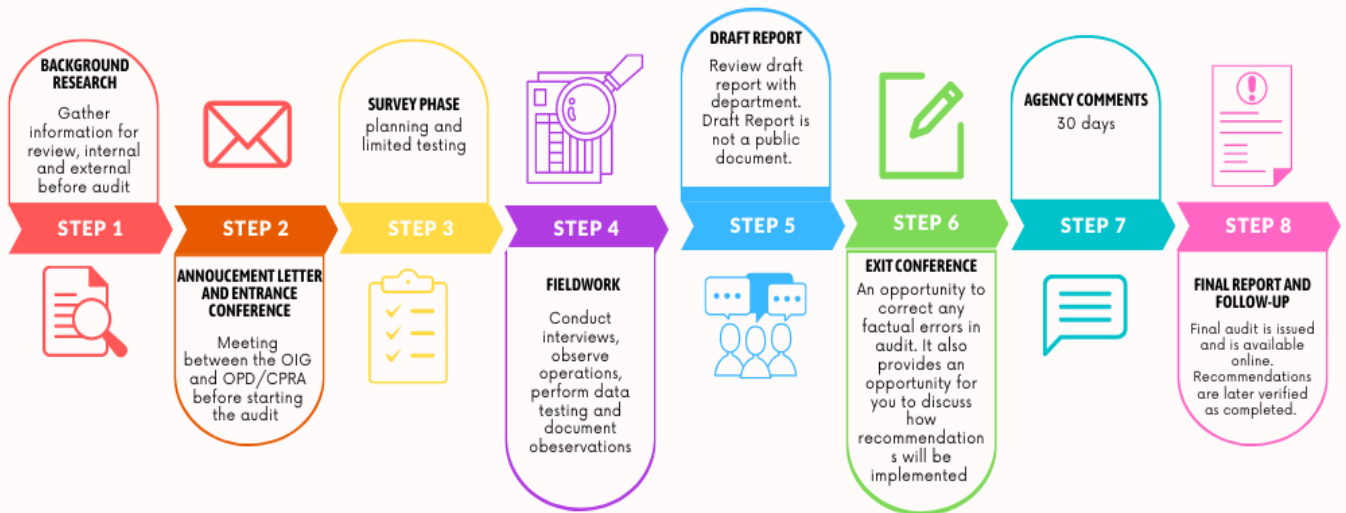
Most performance audits are generally conducted in the same way. The below flow chart outlines the general steps:



**OFFICE OF THE INSPECTOR GENERAL
CITY OF OAKLAND POLICE COMMISSION
STANDARD OPERATING PROCEDURES**

PERFORMANCE AUDIT PROCESS

OFFICE OF THE INSPECTOR GENERAL



Employee Acknowledgement of Receipt

As a staff member of the Office of the Inspector General for the City of Oakland, I _____ have received a personal copy of the Office of the Inspector General, Standard Operating procedures on _____, to review and maintain for my personal records. This signed copy acknowledges that I did receive a copy of the policy for my use. It also acknowledges that I agree to review the policy, and if I do not understand any sections that I will immediately contact my supervisor for further explanation. I understand that the Office of Inspector General is committed to promoting and ensuring accountability, transparency and integrity in its daily operation and function. I am aware that any violation of the policy by me could subject me to disciplinary action. I also am aware that a copy of this Acknowledgment will become part of my agency personnel file.

Employee Signature

Printed Name of Employee

Date Signed



**OFFICE OF THE INSPECTOR GENERAL
CITY OF OAKLAND POLICE COMMISSION
STANDARD OPERATING PROCEDURES**

Supervisor or Witness Signature

Date Signed