



DATE: April 7, 2025

TO: Honorable Mayor and Members of the City Council through City Manager

FROM: Brian Miller, Police Chief
Nick McGowan, Deputy Police Chief
Garrett Glaviano, Professional Standards Lieutenant

SUBJECT: Receive and review the 2024 Independent Police Auditor's (IPA) Annual Report, covering the period from January 1, 2024, to December 31, 2024, and the 2025 Independent Police Auditor's Work Plan

RECOMMENDATION

Receive and review the 2024 Independent Police Auditor's (IPA) Annual Report, covering the period from January 1, 2024, to December 31, 2024, and the 2025 Independent Police Auditor's Work Plan.

BACKGROUND

Following the nationwide focus on community race relations and public safety, the City of Petaluma established a 28-community member Ad Hoc Community Advisory Committee (AHCAC), comprised of representatives from various groups, including many representing our black, indigenous, and people of color (BIPOC) communities, to discuss race relations and identify opportunities for meaningful change in our City. The AHCAC provided 31 recommendations, including the implementation of a Hybrid Police Oversight Model and Citywide Diversity, Equity, and Inclusion Efforts.

In May 2022, the City Council identified the establishment of a hybrid model for civilian police oversight as one of its top 10 goals and priorities. The hybrid model implemented consists of the Office of the Independent Police Auditor and the Public Safety Advisory Committee (PSAC), combining independent oversight with community engagement and professional standards to enhance transparency and accountability. Together, these components aim to strengthen community trust and improve police oversight by engaging an Independent Police Auditor and fostering collaboration with community members.

In an effort to meet the objectives established by the hybrid model for civilian oversight and adhere to best practices, the Department restructured the organization to create the Professional

Standards Division (PSD) that is responsible for the oversight and compliance of the entire department. In our efforts for transparency and accountability, the PSD is responsible for recruitment, retention, training, and oversight, which includes, but is not limited to employee training, Internal Affairs Investigations, liaison to Human Resources, compliance management, employee conduct, coordination with the Independent Police Auditor, and the issuance and auditing of departmental equipment.

Based upon a comprehensive evaluation of all the proposals received, the interviews conducted, and the alignment with the requirements outlined in the RFP, IntegrAssure, Inc. emerged as the most qualified and best fit to serve as the City of Petaluma's first Independent Police Auditor. The selection process was rigorous and included feedback from a variety of stakeholders, such as community leaders and existing clients, to ensure that the City picked the most suitable candidate for the job.

IntegrAssure, Inc. is a consulting firm with more than 40 years of expertise in law, investigations, and law enforcement and deep subject matter expertise in law enforcement oversight, having performed similar oversight services for various cities, designing police auditing mechanisms, and conducting independent reviews of police departments, including policy review, training, de-escalation strategies, use of force practices and critical incident and officer-involved shooting investigations and after-action review. The team brings a diverse and robust skill set to the IPA role, specializing in law enforcement reform, legal expertise, and community-oriented policing, underlining their commitment to accountability, transparency, and continuous improvement in police practices.

Since April 2023, IntegrAssure, Inc. has served as the City of Petaluma's Independent Police Auditor (IPA), working closely with stakeholders to enhance oversight and accountability. In its initial month, the IPA focused on establishing collaborative relationships with key partners, including the City Manager's Office, the City Attorney's Office, and the Petaluma Police Department (PPD). During the first on-site visit in April, the IPA met with City officials, PPD leadership, and the Peace Officers Association of Petaluma (POAP), the labor union representing PPD officers. The IPA also attended PPD roll calls and participated in ride-a-longs to gain operational insight.

In July 2024, the PSAC held its first meeting after being appointed by the City Council. The IPA assisted with onboarding the newly established Public Safety Advisory Committee (PSAC). This included presentations on identifying their roles as PSAC members and a review of the IPA's initial 2023 annual report and assessment of the Police Department. The IPA provided training and guidance to the PSAC members and regularly discusses how their oversight is working to improve the quality of service provided by the Department and ensure best practices are followed. Since then, the IPA has maintained regular engagement with PSAC members, City officials, and PPD leadership, continuing to strengthen relationships and provide the city's adopted hybrid independent oversight model.

During its meetings, the PSAC has covered a wide range of topics to better understand public safety and police operations. These have included First Amendment rights, the Brown Act, and the Annual AB481 Military Equipment Use Report. Members also received an overview of the

Petaluma Police Department's structure and operations, along with introductions to district policing, community policing, and police service priorities.

The PSAC received a presentation on the [Racial and Identity Profiling Act \(RIPA\) from Dr. Lorie Fridell](#) and discussed a *San Francisco Chronicle* article about "Clean Agreements." Additional presentations included the Specialized Assistance for Everyone (SAFE)/Mentor Me program. Additionally, the PSAC reviewed and discussed the 2023 Independent Police Auditor (IPA) Annual Report, the Addendum to that report, and police personnel records governed by Section 832.7 of the California Penal Code.

DISCUSSION

The attached 2024 Annual Report completed by the Independent Police Auditor offers a detailed overview of the IPA's year of operation. It encapsulates the foundational philosophy guiding the IPA, introduces the IPA team, and outlines the various roles and responsibilities of the IPA. The report emphasizes the IPA's commitment to transparency, accountability, and continuous improvement in policing practices within the City of Petaluma. Furthermore, the report discusses the IPA's methodologies used in reviewing and assessing our police operations, including critical incidents, uses of force, vehicular pursuits, audits of complaints, discipline, and police policies and training, to offer insights into the findings and recommendations aimed at improving policing standards and practices in Petaluma.

The goal of the IPA's oversight has been to ensure that policies, training, operational integrity, and accountability all reflect best policing practices. The IPA's approach to oversight has been collaborative with the Department and the City to ensure that best practices are employed in every aspect of policing and our service to the community.

In order to assist with achieving the most efficient workflow with the IPA, the Department provided them with unfettered access to all of our systems and databases. This access has made it possible for the IPA to review use of force incidents, pursuits, audits of complaints and discipline, recommendations for policy and training enhancements, as well as to provide real-time feedback and discussions with the Department. This access and real-time discourse have allowed the IPA and staff to collectively identify potential risks and remediate them appropriately in a timely manner. The IPA has applauded the way in which the Department has collaborated, providing unfettered access to its systems and meaningful engagement in discussions relative to the improvement of the Department.

To facilitate open communication and further collaboration, weekly meetings with the IPA, were established with departmental leadership and the City Attorney's Office to review and discuss assessments of officer-involved pursuits, civilian complaints, and uses of force. These meetings have also focused on policy recommendations from the IPA and current events within the Department. During these meetings, the IPA team presented their preliminary assessments and recommendations to staff and listened to any concerns expressed by the Department in response, before finalizing recommendations.

The review and assessment of incidents conducted by the IPA and the Department have a comprehensive 360-degree field of view. This means that each incident is examined not only as to whether it was lawful and within policy, but whether collateral aspects of the incident meet with operational best practice(s) while also highlighting areas of excellence and identifying opportunities for improvement. This approach aligns with both the Department's and the IPA's commitment to continuous improvement in law enforcement, ensuring that officers not only adhere to laws and policies but also respond effectively to the evolving needs and expectations of the communities they serve.

Specifically, these robust reviews examine the following:

- Compliance with the Body Worn Camera policy
- How the incident arose (self-initiated, dispatched, direct community member complaint)
- Pre-incident Planning and Decision Making
- Legal predicate for initial contact with subjects
- Communication with subjects
- De-escalation of interactions
- Evaluations of Use or Display of Force (including de-escalation, duty to intervene, medical response, relief protocol adherence)
- Evaluations of Pursuits
- Evaluation of Complaints (including the incident itself and the investigation of the complaint)
- Evaluation of Fourth Amendment issues including any restraint, frisk or search
- Evaluation of first amendment issues including freedom of speech and assembly
- Professionalism of Officers
- Tactics of Officers
- Policy implications of incidents
- Equipment implications of incidents
- Documentation by officers including completion of Racial and Identity Profiling Act form when required
- Supervisory review of incidents
- Exceptional conduct by any involved officer

A review of every supervisor's investigation into each event and incident both in terms of completeness and conclusions is also completed. Following those reviews the IPA makes relevant findings, recommendations, and notes any exceptional conduct. Beyond the lawfulness and adherence to policy, the IPA and Department review and discuss best practices to determine whether anything could have been done differently to have potentially achieved a better outcome, to help train for future incidents. Especially, in cases involving the use of force, both the IPA and Department agree that the goal and ultimate outcome is to reduce or eliminate the necessity of using force as much as possible while still providing effective policing services.

The comprehensive examination of each incident by the supervisor, divisional lieutenant, and the Professional Standards Division (PSD) represents a significant change from the Department's traditional approach of singularly having the PSD responsible for review. Additionally, the previous focus of each review was narrow and specific to just the topic area that triggered the

review, such as the application of force. In contrast, the current method adopts a thorough, start-to-finish analysis. This shift has greatly expanded the staff time invested across all department levels, enhancing the depth and meticulousness of the review process. Additionally, many of these incidents involve numerous hours of video footage from multiple officers, requiring detailed scrutiny by every reviewer. This robust analysis helps to ensure that supervisors and managers are maximizing opportunities for coaching, mentoring, supervising, and training staff.

The IPA developed and delivered specific recommendations for improving the Department's policies and practices, all of which were accepted by the Department. The Department proactively shared all recommendations and feedback with the POAP for further input prior to implementing or modifying policies or procedures to enhance transparency and trust and assist with successful implementation at all levels of the Department. Collectively, the Department and IPA reviewed and assessed the policies encompassing vehicle pursuits, handcuffing, officers' use of profanity, body-worn cameras, biased policing, and internal investigations and disciplinary procedures.

The 2024 Annual Report from the IPA reflects the City of Petaluma's ongoing commitment to transparency, accountability, and continuous improvement in policing. Now in its second year, the IPA program has developed a strong, cooperative relationship with the Department, emphasizing proactive oversight, meaningful reform, and community trust.

Key Highlights:

1. **Community-Driven Oversight Progress:** The IPA was established following community recommendations and is part of a broader effort to improve race relations, inclusiveness, and public safety. A major milestone in 2024 was the creation of the Public Safety Advisory Committee (PSAC), a community body that now works in an advisory role in partnership with the IPA and the Department.
2. **Incident and Complaint Reviews:** In 2024, the IPA reviewed 73 incidents involving use or display of force and vehicle pursuits. Of these, 48 led to formal recommendations. While no uses of force were deemed out of policy, the IPA identified several areas for improvement, including tactics, communication, use of equipment like body-worn cameras (BWCs), and deployment of the SAFE (Specialized Assistance for Everyone) mental health response team.
3. **Professional Conduct:** The report praises PPD officers for generally professional, respectful conduct; even in high-stress situations. Some officers were recognized for exemplary handling of complex incidents. Where issues arose, the IPA and the Department worked collaboratively on "Agreed Upon Courses of Action" to guide training or policy updates.
4. **Use of Force Trends:** Use of force incidents decreased slightly compared to 2023. Notably, force was used in less than 0.08% of all service calls, with no serious injuries reported. The IPA analyzed racial and demographic data and found disparities in force

usage, but no evidence of bias. The report stresses the importance of ongoing data analysis to understand and address any disparities.

5. **Policy and Training Enhancements:** The IPA worked with the Department to review and recommend updates to several key policies, including those on use of force, vehicle pursuits, the WRAP restraint device, and BWCs. The IPA also participated in observing officer training and audits of background investigations.
6. **Complaint Oversight:** The IPA reviewed 47 internal and external complaint investigations, agreeing with all final outcomes and making recommendations in seven cases to improve investigative practices. The IPA also directly received seven complaints from the community and referred them appropriately for investigation.
7. **Community Engagement and Transparency:** The IPA attended all PSAC meetings and continues to provide training, guidance, and public reporting. It also initiated a new audit process, the Detailed Analysis of Tour Activity (DATA), to review day-to-day police operations for policy compliance and professional conduct.
8. **RIPA Data Integration and Community Feedback:** In addition, the report includes the Racial & Identity Profiling Act (RIPA) data for both 2023 and 2024, as requested by the City Council in 2023. This inclusion reflects the City's ongoing commitment to evaluating and addressing disparities in policing and supports the broader goal of fostering trust and equity in police-community interactions. Community feedback gathered during the [March 26, 2025](#), PSAC meeting, which focused on demographics, disparities, and the balance between qualitative and quantitative analysis was incorporated into the final report for City Council review.

The IPA's 2024 report shows that Petaluma's hybrid model of police oversight is working as intended. The system is identifying small issues early, fostering open dialogue between the City, community, and police, and advancing best practices through coaching, training, and policy updates. The overarching goal remains consistent: to make policing in Petaluma safer, fairer, and more trusted for all residents.

On [February 26, 2025](#), the IPA presented the 2024 Annual Report to the PSAC, offering a structured forum for review and discussion. The presentation generated two public comments and additional questions from committee members.

The comments included questions regarding the analysis of 2023 RIPA data as it relates to perceived discrepancies, searches, and gender recognition. There was also a discussion regarding the department's ability to track officers who may have repeated issues, such as adherence to body-worn camera policy violations. Questions also included the utilization of the SAFE Team and less lethal force options. Lastly, suggestions on how to present data to enhance clarity for the reader. This presentation allowed both PSAC members and community stakeholders to engage directly with the report, providing valuable feedback and raising clarifying questions regarding its findings and recommendations. Their input was crucial in refining the final version, ensuring it accurately reflected public concerns and oversight priorities. Following this collaborative

process, the revised annual report was formally submitted to the city council for further consideration and action.

This agenda item was presented again during the [March 26, 2025](#), PSAC meeting, during which the IPA specifically presented the 2024 RIPA data which was available for discussion at the time of the February meeting. Both the IPA and City staff considered feedback provided by PSAC members and have worked to thoughtfully incorporate those perspectives into the staff report. During the meeting, comments were made and discussed regarding the 2024 RIPA data, with particular focus on demographic breakdowns, disparities, questions about appropriate benchmarks for comparison, and the balance between qualitative and quantitative analysis in interpreting the findings. This feedback was carefully reviewed and integrated into the final report prepared for City Council consideration, ensuring the report reflects a broader range of community input and continues to support meaningful dialogue and data-informed decision-making in Petaluma's public safety efforts.

To continue the productive momentum the Department and IPA worked to propose a work plan for 2025. The plan outlines the work goals and timeframes for specific areas of interest. We look forward to the City Council's review and feedback on the IPA's 2024 Annual Report and the 2025 Work Plan.

PUBLIC OUTREACH

This agenda item appeared on the City's tentative agenda document on March 17, 2025, which was a publicly noticed meeting.

On [February 26, 2025](#), the Independent Police Auditor presented the 2024 Annual Report to the Public Safety Advisory Committee, offering a structured forum for review and discussion. The presentation generated two public comments and additional questions from committee members. Additionally, on [March 26, 2025](#), the IPA presented the 2024 RIPA data during the Public Safety Advisory meeting. Feedback from the PSAC meetings was used to make revisions to the 2024 Annual Report and included in the staff report.

COUNCIL GOAL ALIGNMENT

The implementation of the Office of the Independent Police Auditor aligns with the Council's goal to implement a Hybrid Police Oversight Model and Citywide Diversity, Equity, and Inclusion Efforts.

The IPA also aligns with and achieves the City Council's goal of "A Safe Community that Thrives."

CLIMATE ACTION/SUSTAINABILITY EFFORTS

There is no climate action or sustainability impacts associated with this item.

ENVIRONMENTAL REVIEW

The proposed action is exempt from the requirements of the California Environmental Quality Act (CEQA) in accordance with CEQA Guidelines Section 15378 as reviewing an annual report from the prior year does not have a direct or indirect effect on the environment.

FINANCIAL IMPACTS

There are no financial impacts associated with this item.

ATTACHMENTS

1. 2024 Independent Police Auditor's Annual Report
2. 2025 Independent Police Auditor's Work Plan
3. Presentation