

NACOLE Case Studies on Civilian Oversight

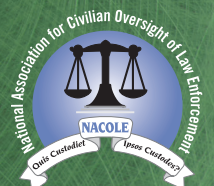
Police Advisory Commission

Philadelphia, Pennsylvania
Review-Focused Model

by Michael Vitoroulis



COPS
Community Oriented Policing Services
U.S. Department of Justice



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Program Context

Philadelphia was the third jurisdiction in the United States to establish formal and independent civilian oversight of its police department.¹ The Philadelphia Police Review Board—established by executive order in 1958—struggled in a hostile political environment and was eventually disbanded. Following several high-profile incidents involving the Philadelphia Police Department (PPD), civilian oversight of the 6,300 sworn member PPD was re-established in 1993 with the creation of Police Advisory Commission (PAC). The PAC is a review-focused agency primarily responsible for conducting reviews and investigations into the policies and procedures of PPD, soliciting input on PPD practices from the city’s population of 1.58 million, and issuing reports recommending changes and improvements to PPD operations. The 13-member commission may receive civilian complaints but may only investigate the individual incident if the alleged conduct is deemed indicative of a broader policy, practice, or custom that the Commission believes needs to be addressed. In 2017, the PAC was delegated the additional responsibility of reviewing the PPD’s implementation of the recommendations contained in the *Final Report of the President’s Task Force on 21st Century Policing*² and the U.S. Department of Justice’s (DOJ) Collaborative Reform Initiative report, *An Assessment of Deadly Force Policy and Practice in the Philadelphia Police Department*.³

1. Washington, D.C., established the first civilian oversight board in 1948. In 1953, New York City created the Civilian Complaint Review Board (CCRB), which was housed within the New York City Police Department and delegated the responsibility of recommending case dispositions to a panel of three police commissioners.

2. President’s Task Force on 21st Century Policing, *Final Report of the President’s Task Force on 21st Century Policing* (Washington, DC: Office of Community Oriented Policing Services, 2015), <https://cops.usdoj.gov/RIC/ric.php?page=detail&id=COPS-P311>.

3. George Fachner and Steven Carter, *An Assessment of Deadly Force in the Philadelphia Police Department*, Collaborative Reform Initiative (Washington, DC: Office of Community Oriented Policing Services, 2015), <https://cops.usdoj.gov/RIC/ric.php?page=detail&id=COPS-W0753>.

History of Civilian Oversight in Philadelphia

Philadelphia's history with civilian oversight began in 1957, when the Philadelphia branch of the American Civil Liberties Union (ACLU) began lobbying the city's elected officials to create a civilian review board in response to strained relationships between the PPD and Black communities throughout the city.⁴ Then Mayor Richardson Dilworth introduced an ordinance establishing a civilian review board. However, the initial proposal lacked the necessary city council support.⁵ In 1958, Dilworth circumvented city council by enacting an executive order creating a five-member Police Review Board (PRB) to receive civilian complaints, review the PPD's complaint investigations, and issue disciplinary recommendations to the police commissioner.⁶

The board struggled from the onset because of a lack of resources, an unclear mandate, and several legal challenges by the Philadelphia Fraternal Order of Police (FOP). In 1959, the FOP filed a preliminary injunction against the city and the PRB, charging that Mayor Dilworth lacked the authority to establish such a body.⁷ The matter was settled out of court and resulted in a name change to the Police Advisory Board (PAB).⁸ In addition, the board was not appropriated a budget until 1960 and did not have a full-time executive secretary until 1963.⁹ A second legal challenge by the FOP in 1965 alleging that the PAB was unconstitutional, paralyzed the board for nearly a year.¹⁰ A third suit by the FOP in 1967 led to a ruling by the Court of Common Pleas that the executive order creating the PAB violated Philadelphia's Home Rule Charter and prevented the board from holding hearings and requesting investigations from PPD.¹¹ The

4. Richard J. Terrill, "Police Accountability in Philadelphia: Retrospects and Prospects," *American Journal of Police* 7, no. 2 (1988): 79–100, 81–82, <https://heinonline.org/HOL/P?h=hein.journals/ajpol7&i=215>.

5. Terrill, "Police Accountability in Philadelphia," 82 (see note 4).

6. Terrill, "Police Accountability in Philadelphia," 82 (see note 4).

7. Nicole Maurantonio, "Standing By: Police Paralysis, Race, and the 1964 Philadelphia Riot," *Journalism History* 38, no. 2 (2012): 110–121, 117, <https://scholarship.richmond.edu/rhetoric-faculty-publications/42/>.

8. Bruria Tal, *Civilian Oversight of Police in Philadelphia: The First 50 Years* (Philadelphia: Philadelphia Police Advisory Commission, 2003), 8, <https://pdfs.semanticscholar.org/01d8/7771f7e58eea6fd728a2263f9068b0934ef5.pdf>.

9. Terrill, "Police Accountability in Philadelphia," 83 (see note 4).

10. Tal, *Civilian Oversight*, 8 (see note 8).

11. Terrill, "Police Accountability in Philadelphia," 83 (see note 4).

Supreme Court of Philadelphia overturned the ruling in 1969,¹² but the board was never reactivated because Dilworth's successor, James Tate, was openly opposed to the PAB.¹³ The PAB was formally disbanded by executive order in late 1969.¹⁴

A series of high-profile scandals and incidents involving the PPD led to several failed attempts to re-establish some form of oversight in the ensuing years. In 1978, a police complaints unit was established within the office of then Philadelphia District Attorney Edward G. Rendell, but the unit was phased out several years later.¹⁵ Amid a federal probe into PPD corruption that led to the conviction of seven police officers, then Mayor Wilson Goode proposed creating a unit composed of lawyers and civilians from other city agencies within the police department to investigate alleged misconduct and corruption.¹⁶

Relations between the PPD and minority communities reached a new low in May 1985 following a standoff and bombing by the PPD of a compound inhabited by the Black liberation group called MOVE, killing 11 civilians and destroying more than 60 neighborhood homes.¹⁷ Two weeks later, PPD initiated a series of aggressive and unlawful roundups in a Puerto Rican neighborhood following the killing of a PPD officer in the same neighborhood.¹⁸ Furthering tensions, PPD's "Operation Cold Turkey" later that year—a stop-and-frisk operation targeting 50 corners in minority neighborhoods that resulted in several searches later deemed illegal—resulted in a \$500,000 settlement in the U.S. District Court for the Eastern District of Pennsylvania.¹⁹

12. *Harrington v. Tate*, 435 Pa. 176, 254 A.2d 622 (Pa. 1969)

13. Terrill, "Police Accountability in Philadelphia," 83-84 (see note 4).

14. Tal, *Civilian Oversight*, 8 (see note 8).

15. John F. Morrison, "Goode Mulls Unit to Probe Cops," *Philadelphia Daily News*, April 19, 1984.

16. Morrison, "Goode Mulls Unit" (see note 15); at the time, then Mayor Goode was explicitly opposed to creating another civilian review board.

17. William K. Stevens, "Police Drop Bomb On Radicals' Home in Philadelphia," *The New York Times*, May 14, 1985, <https://www.nytimes.com/1985/05/14/us/police-drop-bomb-on-radicals-home-in-philadelphia.html>.

18. Lindsey, Gruson, "Philadelphia Roundups Incense Puerto Ricans," *The New York Times*, June 21, 1985, <https://www.nytimes.com/1985/06/21/us/philadelphia-roundups-incense-puerto-ricans.html>.

19. Nat Hentoff, "Operation Cold Turkey," *The Washington Post*, December 6, 1986, https://www.washingtonpost.com/archive/opinions/1986/12/06/operation-cold-turkey/defee26f-10b7-4b08-a982-904d50426bbb/?utm_term=.aadb4f05a81; *Cliett v. City of Philadelphia*, Civil Action 85-1846 (E.D. Pa. 1985).

In 1985, community groups led by the ACLU formed a coalition called the Coalition for Police Accountability (CPA). The coalition met with PPD executives to discuss the department's policies and procedures.²⁰ The CPA issued a report that was highly critical of the PPD's use of force, demographic composition, and handling of misconduct allegations.²¹ Among the report's recommendations was the creation of a new system to handle civilian complaints, suggesting a civilian board of police commissioners with the authority to manage PPD as one option.²² The CPA disbanded in the late 1980s.²³

20. Tal, *Civilian Oversight*, 10 (see note 8).

21. Christopher Hepp, "Coalition Submits Reforms to Reduce Police Misconduct," *The Philadelphia Inquirer*, April 22, 1986.

22. Hepp, "Coalition Submits" (see note 21).

23. Tal, *Civilian Oversight*, 10 (see note 8).

Genesis and Evolution of the Police Advisory Commission

The CPA was reconvened in 1992 after another set of high-profile scandals involving the PPD.²⁴ This incarnation was made up of roughly 30 community and legal groups and focused on establishing a permanent civilian review board to investigate allegations of misconduct and review the PPD's policies and procedures.²⁵ Then Mayor Edward Rendell resisted the idea, claiming that civilian oversight was "totally unnecessary and potentially demoralizing to the police force."²⁶ In September 1992, council member Michael Nutter introduced a bill to strengthen the PPD's processes for handling civilian complaints.²⁷ By December 1992, the Philadelphia City Council was holding hearings on a separate bill creating a Police Advisory Board that would be authorized to independently investigate civilian complaints.²⁸ Then Police Commissioner Richard Neal and the FOP expressed firm opposition to re-establishing civilian oversight of the PPD.²⁹

In May 1993, Nutter's advisory board proposal passed within the city council by a vote of 11-6, one vote short of what was needed to prevent a veto of the bill by the mayor.³⁰ Citing the potential negative impact on officer morale, Mayor Rendell vetoed the council-approved investigative board and vowed to establish a review-focused agency without the authority to conduct independent investigations in its place.³¹ The mayor's veto was subsequently overridden at the

24. Tal, *Civilian Oversight*, 10 (see note 8).

25. Jeff Gammage, "Civic Coalition Urging Permanent Police Review Board Citing Recent Incidents," *The Philadelphia Inquirer*, July 29, 1992.

26. Jeff Gammage, "Rendell Says No to Review Board for Police Force," *The Philadelphia Inquirer*, July 31, 1992.

27. Mark McDonald, "Councilman Touts Bill for Police Accountability," *Philadelphia Daily News*, September 18, 1992.

28. Jeff Gammage, "Hearings Begin on Police Review Panel," *The Philadelphia Inquirer*, December 16, 1992.

29. Jeff Gammage, "Police Review Panel Not to Neal's Liking," *The Philadelphia Inquirer*, January 29, 1993.

30. Doreen Carvajal and Jeff Gammage, "Council Backs Civilian Review of Police," *The Philadelphia Inquirer*, May 21, 1993.

31. Mark McDonald, "Rendell Vetoes Police Board But Then Sets Up a Similar Entity," *Philadelphia Daily News*, June 4, 1993.

last minute after a city councilmember changed their vote in favor of Nutter’s proposal.³² In response, Rendell vowed to work with the city council in establishing an executive order that reached a compromise over the review board’s authority.³³

As deliberations continued, however, proponents of oversight began expressing concern over the mayor’s proposal. It lacked subpoena power, subjected the release of findings to approval by the mayor and police commissioner, and allowed the mayor to appoint the board’s chair.³⁴ Following several months of tension between Mayor Rendell and Councilman Nutter,³⁵ a compromise that mirrored much of the city council’s original proposal was reached in late October 1993.³⁶ The agreed-upon commission—to be called the Police Advisory Commission (PAC)—would have the authority to conduct independent investigations into individual allegations of misconduct.³⁷ The 13-member commission was also granted subpoena power and the ability to publicize findings three days after submitting them to the mayor, his or her managing director, and the police commissioner.³⁸ The PAC was established by executive order because the mayor claimed that oversight established by council ordinance would violate the city charter.³⁹

Executive Order 8-93 establishing the PAC created a 13-member commission of mayoral appointees, six of whom would be appointed from a list of nominees presented by the city council.⁴⁰ The executive order also required that three members be experienced law enforcement professionals who are not sworn or currently employed police officers.⁴¹

32. Mark McDonald and Paul Maryniak, “Ed’s Police-Board Veto KO’d,” *Philadelphia Daily News*, June 11, 1993.

33. McDonald and Maryniak, “Ed’s Police-Board Veto” (see note 32).

34. Editorial Board, “Police Review Panel Will Be Toothless,” *Philadelphia Daily News*, August 27, 1993.

35. Doreen Carvajal, “Marching Side by Side Along a Divide, Rendell and Nutter Are Far From A Truce, Despite the Calm at the Puerto Rican Parade,” *The Philadelphia Inquirer*, September 27, 1993.

36. Amy S. Rosenberg, “Rendell OKs a Stronger Police Panel,” *The Philadelphia Inquirer*, October 29, 1993.

37. Rosenberg, “Rendell OKs” (see note 36).

38. Rosenberg, “Rendell OKs” (see note 36).

39. Mark McDonald, “Ed, Council Finalize Police Review Board,” *Philadelphia Daily News*, October 29, 1993.

40. Executive Order 8-93 §(1)(a), <https://www.phila.gov/ExecutiveOrders/Executive%20Orders/8-93Amend3.pdf>.

41. Executive Order 8-93 §(2).

The chair of the commission would be elected by a majority vote of its members.⁴² The PAC would be empowered to “select individual incidents to review and broader issues to study”⁴³ and issue recommendations and issue public reports.⁴⁴

The executive order also required the PAC to establish a mediation program to informally resolve complaints,⁴⁵ but such a program was never established. During site visit interviews, the PAC staff and members of the PPD’s Internal Affairs Bureau (IAB) said the collective bargaining agreement with the FOP precluded the creation of a mediation program, although it is unclear whether this was the case at the time the PAC was created.

Despite the compromise over the PAC’s authority to conduct individual complaint investigations, Executive Order 8-93 did not include explicit language authorizing the investigation of individual complaints. While the order permitted the commission to hire its own executive director and “investigative and clerical staff,”⁴⁶ the commission’s powers and duties with regard to individual incidents included language such as “study” or “review.” Since its inception, the PAC’s operational interpretation of executive order 8-93 was that it was empowered to interview subject officers and conduct investigations into individual incidents of alleged misconduct. The FOP filed several lawsuits in the early years of the PAC, alleging that the PAC had been illegally created and that it was not permitted to interfere with the operations of the police department by conducting investigations.⁴⁷ These lawsuits were either dismissed, withdrawn, or successfully defended by the pro bono counsel retained by the commission in its first year.⁴⁸

In the years that followed, a stagnation in resources and lack of support by the city administration presented serious challenges for the PAC. The commission’s independent counsel ceased to operate on a pro bono basis in 1999 amid persistent litigation by the FOP.⁴⁹ Despite increases in

42. Executive Order 8-93 §(2)(d).

43. Executive Order 8-93 §(3)(b).

44. Executive Order 8-93 §(3)(e).

45. Executive Order 8-93 §(3)(e).

46. Executive Order 8-93 §(2)(e).

47. *1995 Fiscal Year Report* (Philadelphia: Police Advisory Commission, 1996), 20–22.

48. *1995 Fiscal Year Report* (Philadelphia: Police Advisory Commission, 1996), 20–22; *1994 Fiscal Year Report* (Philadelphia: Police Advisory Commission, 1995), 10.

49. *1999 Fiscal Year Report* (Philadelphia: Police Advisory Commission, 2000), 17.

caseload every year,⁵⁰ the commission's operating budget in 2002 remained essentially unchanged from its initial appropriation in 1994.⁵¹ With just three investigative staff members, the burden of the PAC's caseload necessitated adopting revised procedures that moved away from the former direct investigative model to auditing the bulk of its cases⁵² and conducting full investigations into only the most serious allegations.⁵³

The PAC also suffered from persistent commission vacancies that hampered its ability to conduct its regular operations. In the years 2000 and 2004, the PAC executive director sent letters to the mayor urging him to appoint members to the commission⁵⁴—but it was required to temporarily suspend complaint hearings until vacancies were filled.⁵⁵ Although several vacancies were filled in 2005, the PAC stopped publishing annual reports because of staffing and resource constraints.⁵⁶

These struggles coincided with a precipitous rise in the number of officer-involved shootings (OIS) throughout the city, averaging 51 OIS per year from 2007–2012.⁵⁷ The PPD effectively shut out the PAC from reviewing shooting incidents by denying the commission's requests for investigative files and other documentation.⁵⁸ As public pressure mounted over the PPD's use of deadly force in 2013, former PPD Commissioner Charles C. Ramsey requested that the U.S. Department of Justice's Office of Community Oriented Policing Services (COPS Office) review the PPD's use of force policies and provide technical assistance in their implementation.⁵⁹ The two-year Collaborative Reform Initiative for Technical Assistance (CRITA) by the COPS Office

50. 2001 *Fiscal Year Report* (Philadelphia: Police Advisory Commission, 2002), 21; 2002 *Fiscal Year Report* (Philadelphia: Police Advisory Commission, 2003), 27.

51. 2002 *Fiscal Year Report*, 43 (see note 50).

52. The PAC's case audits entailed reviewing cases investigated by the PPD's IAB for completeness, accuracy, and fairness. See FY2004 *Executive Summary* (Philadelphia: Police Advisory Commission, 2005), 1.

53. FY2004 *Executive Summary*, 27 (see note 52).

54. 2005–2008 *Annual Report* (Philadelphia: Police Advisory Commission, 2009), 46.

55. William Kenny, 2004. "Shortage of Members Stymies Police Commission," *The Northeast Times*, September 9, 2004.

56. 2005–2008 *Annual Report*, 5 (see note 54).

57. PPD Website Police Discharge Statistics - 3rd Quarter - January - September 2016" (Philadelphia: Philadelphia Police Department, n.d.), <https://www.phillypolice.com/assets/crime-maps-stats/officer-involved-shootings/master-report-ois.pdf>.

58. Community Lawyering Clinic, Kline School of Law at Drexel University, *Fatal Force in Philadelphia: A Report to the UN Committee on the Elimination of Racial Discrimination* (Philadelphia: Drexel University, 2015), <https://drexel.edu/law/about/news/articles/overview/2015/December/Clinic-Philadelphia-Police-12102015/>.

59. Larry Miller, "Ramsey Calls for Review of Deadly Force Policy," *The Philadelphia Tribune*, May 31, 2013.

identified several deficiencies in the PPD’s use of force policies, training, OIS investigations, force review systems, and accountability mechanisms.⁶⁰ With regard to the PPD’s relationship with the PAC, the COPS Office CRITA report found:

“The department has not cooperated with the PAC’s request for access to OIS investigative files and statistical data. Yet Executive Order No. 8-93 empowers the PAC to access such data related to any internal investigation into police misconduct. The order states that the commission will have “full access to relevant police department personnel for interview and to relevant documents, including . . . all general summaries, statistical compilations, and other internal reports on shootings, injuries, complaints of abuse, training, and any other issues related to the work of the commission.”⁶¹

The report also recommended that the PPD establish a new use of force review board (UFRB) to conduct comprehensive reviews of critical use of force incidents and allow one civilian member to have a voting seat on the board.⁶²

In March 2015, then Mayor Michael Nutter enacted an executive order creating a community oversight board (COB) responsible for overseeing the PPD’s implementation of the recommendations included in the COPS Office CRITA report. The board was composed of 15 mayoral appointees tasked with “monitor[ing] and assess[ing] the Department’s progress in materially implementing the recommendations . . . and the effects of the implemented recommendations on the . . . relationship between the Department and the community.”⁶³ The PAC executive director was appointed to the COB as a voting member.⁶⁴ In the years that followed, the PPD made significant progress in implementing the recommended reforms⁶⁵ including making the PAC executive director a voting member of the department’s UFRB, posting information about

60. Fachner and Carter, *An Assessment of Deadly Force Policy* (see note 3).

61. Fachner and Carter, *An Assessment of Deadly Force Policy*, 121 (see note 3).

62. Fachner and Carter, *An Assessment of Deadly Force Policy*, 114 (see note 3).

63. Executive Order 1-15 §3(A), <https://www.phila.gov/ExecutiveOrders/Executive%20Orders/eo115.pdf>.

64. Larry Miller, “Nutter Names Policing Oversight Board Members,” *The Philadelphia Tribune*, April 19, 2015.

65. James Coldren et al., *Six-Month Assessment Report on the Philadelphia Police Department*, Collaborative Reform Initiative (Washington, DC: Office of Community Oriented Policing Services, 2015), <https://cops.usdoj.gov/RIC/ric.php?page=detail&id=COPS-W0792>.

officer-involved shootings online,⁶⁶ and maintaining a publicly accessible directory of civilian complaints on its website.⁶⁷ The PAC began posting data on civilian complaints it received—including complainant race and gender and an interactive map of incident locations—on the OpenDataPhilly portal before the PPD in 2012.⁶⁸ At that time, the PAC began working with the PPD to incorporate complaints filed with the department’s IAB into the database.⁶⁹ However, the PPD did not make its complaint data open to the public until 2017.

While many touted the department’s reforms as meaningful improvements, others still expressed concern that the PAC remained woefully underfunded despite newly elected Mayor Jim Kenney’s claim that he would like to see the PAC’s budget increase to more than \$1.5 million over the next several years.⁷⁰

In January 2017, Mayor Kenney issued a new executive order re-establishing the PAC with a broader policy-focused mandate described further in the Scope of Authority section of this report, signaling a renewed effort by the city to strengthen the PAC. The executive order creating the COB was rescinded, and the PAC assumed responsibility of overseeing the department’s implementation of both the collaborative reform initiative recommendations and the recommendations contained in the *Final Report of the President’s Task Force on 21st Century Policing*.⁷¹ In September 2017, the Philadelphia city council introduced a resolution proposing a charter amendment requiring a mandatory minimum of \$500,000 be appropriated to the PAC annually.⁷² Philadelphia voters approved the proposed charter amendment in May 2018 with 64.85 percent of the vote.⁷³

66. “Officer Involved Shootings,” Philadelphia Police Department, accessed August 17, 2020, <https://www.phillypolice.com/ois/>.

67. “Open and Accountable,” Philadelphia Police Department, accessed August 17, 2020, https://www.phillypolice.com/accountability/index.html?_ID=110&_ClassName=CapPage#complaints.

68. “Police Advisory Commission Complaints,” OpenDataPhilly, accessed August 17, 2020, <https://www.opendataphilly.org/dataset/philadelphia-police-advisory-commission-complaints>.

69. Juliana Reyes, “Police Advisory Commission Releases Its Police Complaint Data, API,” Technical.ly Philly, January 28, 2013, <https://technical.ly/philly/2013/01/28/city-of-philadelphia-police-complaint-data-api/>.

70. Ernest Owens, “The Ernest Opinion: Kenney Is All Talk, No Walk on Civilian Protections from Police Misconduct,” *Metro - Philadelphia*, March 11, 2016.

71. President’s Task Force on 21st Century Policing, *Final Report* (see note 2).

72. Philadelphia City Council Resolution No. 170743, September 14, 2017, <https://phila.legistar.com/LegislationDetail.aspx?ID=3154780&GUID=0D7CEED6-44EF-4BE9-AD82-CFC395BDE029>.

73. “Philadelphia, Ballot Question 1, Police Advisory Commission Funds Charter Amendment (May 2018),” Ballotpedia, accessed August 17, 2020, [https://ballotpedia.org/Philadelphia,_Ballot_Question_1,_Police_Advisory_Commission_Funds_Charter_Amendment_\(May_2018\)](https://ballotpedia.org/Philadelphia,_Ballot_Question_1,_Police_Advisory_Commission_Funds_Charter_Amendment_(May_2018)).

Organizational Structure

Executive Order 2-17 established the PAC as an advisory commission to the mayor located within the managing director’s office.⁷⁴

Commission appointment and terms

The PAC is composed of 13 voting members who are all appointed by the mayor.⁷⁵ Four members are appointed from a list of 10 nominations provided by city council;⁷⁶ four members are appointed by civic, advocacy, legal, and law enforcement organizations chosen by the mayor;⁷⁷ and five members are appointed at the mayor’s discretion after consultation with relevant city agencies, including the Commission on Human Relations, the Office of LGBT Affairs, and the Office of Public Engagement.⁷⁸ The mayor’s appointments must ensure that two former law enforcement officials serve on the commission.⁷⁹ The mayor may reject any nominee provided by any of the above agencies, and upon the mayor’s request any such agency shall promptly provide the mayor with an additional list of nominees. The managing director or the managing director’s designee shall serve as a nonvoting member of the commission.⁸⁰ The managing director or his or her designee is entitled to all of the rights, powers, and duties of other members of the commission, including the right to attend any of the commission’s executive sessions.⁸¹ The mayor is also responsible for appointing one member as the commission chair.⁸² All members serve at the pleasure of the mayor.⁸³

74. The Office of the Managing Director supervises several operating departments of the City of Philadelphia and works to coordinate different city services. Executive Order 2-17 §1, <https://www.phila.gov/ExecutiveOrders/Executive%20Orders/eo3217%20Police%20Advisory%20Commission.pdf>.

75. Executive Order 2-17 §(2)(A).

76. Executive Order 2-17 §(2)(A)(i).

77. Executive Order 2-17 §(2)(A)(ii).

78. Executive Order 2-17 §(2)(A)(iii).

79. Executive Order 2-17 §(2)(A).

80. Executive Order 2-17 §(2).

81. Executive Order 2-17 §(2).

82. Executive Order 2-17 §(2)(C).

83. Executive Order 2-17 §(2)(C).

All commission members serve two-year terms.⁸⁴ Members may hold other city appointments during their term on the PAC.⁸⁵ Members must be residents of or work for the City of Philadelphia; however, no member may be an active law enforcement official.⁸⁶

Committee structure

The PAC consists of six standing committees and may establish special or ad hoc committees by majority vote.⁸⁷ The six standing committees and their responsibilities are as follows:⁸⁸

1. **Executive Committee.** Consists of the officers of the commission⁸⁹ and executive director, who are responsible for overseeing the operations of the commission subject to its internal operating procedures and Executive Order 2-17.
2. **Operating Procedures Committee.** Drafts the commission's operating procedures and submits them for approval by the commission. The committee is also responsible for revising the operating procedures to reflect the commission's decisions and suggested addenda from other committees, as well as standardizing the PAC training program for commission approval.
3. **Public Relations and Community Relations Committee.** Responsible for coordinating with the PAC's public relations unit in handling publicity regarding media requests, communicating with the public, and preparing press releases; presenting statements to be approved by the executive committee; and coordinating the role of the commission during public hearings.
4. **Policy and Practices Committee.** Responsible for recommending and reporting on PPD policies and practices that should be studied or investigated and recommending to the commission any complaints that should be scheduled for public hearing. It may also designate subcommittees such as a data and research subcommittee or investigation subcommittee.

84. Executive Order 2-17 §(2)(C).

85. Executive Order 2-17 §(2)(D).

86. Executive Order 2-17 §(2)(E).

87. Police Advisory Commission, *Internal Operating Procedures*. (Philadelphia: Police Advisory Commission, 2018), 10.

88. Police Advisory Commission, *Internal Operating Procedures*, 8-10 (see note 87).

89. The PAC's officers include chair, vice-chair, chair pro tem, secretary, and parliamentarian.

5. **Annual Report Committee.** Responsible for preparing an annual summary of the PAC's activities and recommendations to be reported to the public.
6. **Personnel Committee.** Responsible for overseeing the executive director's recommendations concerning the hiring or termination of staff members, overseeing the enforcement of personnel policies, and conducting an annual performance review of the executive director. The executive director remains responsible for the day-to-day operations of the PAC and its personnel.

Training

The Law Department and Police Department are responsible for jointly developing and providing appropriate training for all members of the commission,⁹⁰ which members must complete within one year of appointment.⁹¹ The training program currently consists of collective bargaining and arbitration processes, PPD OIS and firearms review board procedures, right-to-know laws, the Criminal History Records Information Act, and sunshine laws.⁹²

Executive director

PAC members are responsible for appointing and hiring an executive director, subject to approval by the mayor.⁹³ The commission may do the same for any other staff as may be necessary, subject to available funding and appropriations.⁹⁴

Staffing

At the time of this writing, the executive director is assisted by eight staff members: one deputy executive director, one special investigator, four policy analysts, one public affairs specialist, and one executive assistant.⁹⁵

90. Executive Order 2-17 §(3)(B).

91. Police Advisory Commission, *Internal Operating Procedures*, 4 (see note 87).

92. Police Advisory Commission, *Internal Operating Procedures*, 4 (see note 87).

93. Executive Order 2-17 §(3)(A).

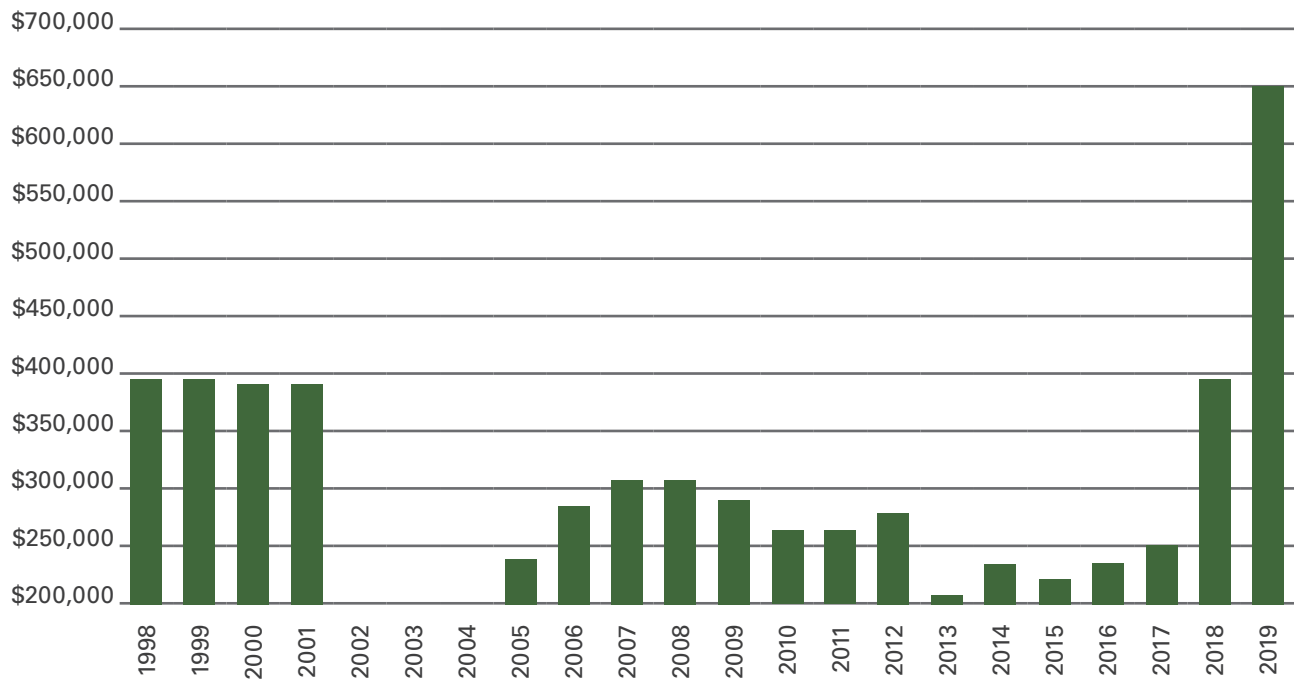
94. Executive Order 2-17 §(3)(A).

95. "Staff and Commissioners," City of Philadelphia, accessed August 17, 2020, <https://www.phila.gov/departments/police-advisory-commission/staff/>.

Budget

The PAC has historically struggled with a small budget appropriation by the city council relative to the size of the PPD or other civilian oversight agencies in similarly sized jurisdictions. A budget floor for the PAC was set at \$500,000 following the passage of a charter amendment put forth by the city council in late 2017. The PAC’s annual budget from 1999 to 2019 is presented in figure 1.

Figure 1. PAC annual budget by fiscal year, 1998–2019



Source (1998–2002): Police Advisory Commission, Annual Report (Philadelphia: Police Advisory Commission, 1998–2002).

Source (2005–2019): Provided by Russell T. Crotts, Assistant City Solicitor, City of Philadelphia, to Michael Vitoroulis, Research Fellow, National Association for Civilian Oversight of Law Enforcement, November 30, 2018, pursuant to Pennsylvania Right-to-Know Law, 65 P.S. § 67.101 et seq.

Scope of Authority

The PAC's jurisdiction focuses primarily on conducting reviews, investigations, and analyses of the policies, practices, and customs of the PPD. Unlike the previous iteration of the PAC, the commission created by Executive Order 2-17 does not have explicit statutory authority to investigate individual civilian complaints or review the IAB's completed civilian complaint investigations unless the commission has reason to believe the investigation or review is indicative of a broader "policy, practice, or custom that needs to be addressed."⁹⁶ Per its enabling legislation, the PAC is to "take reasonable steps to minimize duplication of effort with respect to investigations performed by any other agencies."⁹⁷ For the purposes of this report, the Scope of Authority and Procedures sections will focus only on the authority and work undertaken by the most recently established PAC.

The police commissioner is required to respond in writing to recommendations emerging from the PAC's policy analyses or investigations into PPD policies, procedures, and customs within 30 days, with the opportunity to request a 15-day extension on a case by case basis.⁹⁸

Policy review

The PAC is authorized to advise and issue recommendations to the mayor's managing director and police commissioner regarding existing and proposed PPD policies in a manner that focuses on efficient, effective, and lawful policing as well as maximizing trust between the police and the community.⁹⁹

In addition, the commission is required to perform the duties of the now-disbanded Community Oversight Board by performing periodic reviews of the PPD's implementation of the recommendations contained in the *Final Report of the President's Task Force on 21st Century Policing*¹⁰⁰ and the COPS Office's CRITA report on the PPD's use of deadly force.¹⁰¹

96. Executive Order 2-17 §(4)(C)(1)(a).

97. Executive Order 2-17 §(4)(C)(1)(b).

98. Executive Order 2-17 §(4)(C)(2).

99. Executive Order 2-17 §(4)(A)(1).

100. President's Task Force on 21st Century Policing, *Final Report* (see note 2).

101. Executive Order 2-17 §(4)(A)(2); Fachner and Carter, *An Assessment of Deadly Force Policy* (see note 3).

Investigations

The PAC’s investigative jurisdiction extends only to “perceived patterns of conduct or systemic issues.”¹⁰² The commission may, at its discretion, initiate an investigation into a community member’s complaint or upon request of the police commissioner regarding police policy, practice, or customs.¹⁰³

The commission may receive civilian complaints alleging misconduct by PPD officers and must forward them to the PPD for investigation.¹⁰⁴ The PPD’s IAB assumes the formal responsibility of processing misconduct complaints, which are assigned either to the IAB or to the pertinent police division for investigation.¹⁰⁵ The outcome of civilian complaints received by the PAC and forwarded to the PPD must be transmitted back to the PAC upon completion.¹⁰⁶

The PAC executive director is one of the five voting members of PPD’s UFRB, which is responsible for adjudicating and issuing findings on IAB’s investigations of OIS and select use of force incidents.¹⁰⁷

Access to information

Per Executive Order 2-17, the PAC is empowered and authorized as follows:

“To review any relevant internal Police documents, including but not limited to any Internal Affairs Division files, subject to any necessary confidentiality agreements requested by the Police Department.”¹⁰⁸

102. Executive Order 2-17 §(4)(C)(1).

103. Executive Order 2-17 §(4)(C)(1)(a).

104. Executive Order 2-17 §(4)(C)(1)(a).

105. *Directive 12.18, Complaints Against the Philadelphia Police Department* (Philadelphia: Philadelphia Police Department, 2015), <https://www.phillypolice.com/assets/directives/D12.18-ComplaintsAgainstThePhiladelphiaPoliceDepartment.pdf>.

106. Executive Order 2-17 §(4)(C)(1)(a).

107. Per PPD policy, cases brought to the UFRB include officer-involved shootings and “those instances . . . where it appears extraordinary and unanticipated actions were required to protect police personnel or others . . . where written policies alone are insufficient to properly evaluate the appropriateness or reasonableness of Police personnel’s actions.” *Directive 10.4, Use of Force Review Board* (Philadelphia: Philadelphia Police Department, 2019), <https://www.phillypolice.com/assets/directives/D10.4-UseOfForceReviewBoard.pdf>.

108. Executive Order 2-17 §(5)(A).

The PAC may also issue subpoenas consistent with the authority granted to city departments, boards, or commissions authorized to hold hearings or conduct investigations.¹⁰⁹

The legislation that previously established the PAC, Executive Order 8-93, included explicit language concerning the PAC's access to certain PPD records. This included IAB files, community member complaints and determinations, and files of any other internal investigative agency charged with investigating police misconduct incidents; police paperwork used for the purpose of investigating or prosecuting suspects; officer assignment and disciplinary records; PPD directives and training manuals; and all general summaries, statistical compilations, and other internal reports on shootings, injuries, complaints of abuse, training, and other issues related to the work of the commission.¹¹⁰

In practice, the PAC submits requests for documents to a liaison in the PPD. The department's Special Legal Advisor to the Philadelphia Police Commissioner¹¹¹ is responsible for responding to the commission's requests and furnishing information that the PPD deems appropriate to share with the PAC. As such, some forms of department records are made more available than others. Civilian complaints and training records, for example, are typically readily furnished upon request. Receipt of information deemed more sensitive by PPD, such as stop and search records, involves frequent deliberation between PPD and the PAC regarding the scope and use of the information. Some records, such as internal complaints filed by PPD officers, are not made available to the PAC. The commission does not have direct access to any of the PPD's databases.

Public reporting and transparency

The commission is required to issue a public annual report describing its accomplishments and recommendations for the year. The report is forwarded to the mayor, managing director, police commissioner, district attorney, city council, and FOP.¹¹²

109. Executive Order 2-17 §(5)(B); Philadelphia Home Rule Charter §8-409.

110. Executive Order 8-93 §(4)(d).

111. The Special Legal Advisor to the Philadelphia Police Commissioner essentially functions as the legal department of the PPD.

112. Executive Order 2-17 §(4)(D).

Community relations

The PAC is mandated to “insure (sic) that major policy revisions which . . . would materially impact the relations between the Police and the community that they serve, be communicated appropriately to the affected communities.”¹¹³ Similarly, the commission must provide meaningful opportunities for affected communities to give their input on existing policies and proposed revisions.¹¹⁴

113. Executive Order 2-17 §(4)(B)(1).

114. Executive Order 2-17 §(4)(C)(2).

Procedures

Complaints

The most recent executive order establishing the PAC gives it jurisdiction to investigate civilian complaints “to the extent the Commission has reason to believe they are indicative of a policy, practice, or custom that needs to be addressed.”¹¹⁵

Civilian complaints may be submitted to the PAC in person, by email, by fax, or on its website.¹¹⁶ PAC complaint forms are also made available at the district and city hall offices for each Philadelphia city council member. Complaint forms are available in English, Spanish, and Chinese.

Within seven days of receiving a complaint, PAC staff will issue a preliminary response notifying the complainant either that the commission shall study the allegations made in the complaint, that the complaint is not ready for review by the commission, that the commission will not study the allegations made or will forward the complaint to the PPD’s IAB, or that the commission shall request additional information if necessary.¹¹⁷

If a complaint is studied by the commission, it shall complete its investigation or hearing “within a reasonable amount of time” and share its conclusions or written report within 90 days of completing its investigation.¹¹⁸

Under its previous executive order, the PAC had a more defined role and participated directly in complaint investigations and reviews. As such, the PAC would frequently conduct hearings, hear officer testimony, and review IAB documents relevant to individual complaints filed with the commission. During this time, the PAC would publicize its findings and recommendations for each case on its website along with responses from the department.¹¹⁹

115. Executive Order 2-17 §(C)(1)(a).

116. Police Advisory Commission, “File a Complaint against a Philadelphia Police Officer,” City of Philadelphia, accessed June 16, 2021, <https://www.phila.gov/services/crime-law-justice/file-a-complaint-against-a-philadelphia-police-officer/>.

117. Police Advisory Commission, *Internal Operating Procedures*, 10 (see note 87).

118. Police Advisory Commission, *Internal Operating Procedures*, 11 (see note 87).

119. “Police Advisory Commission Meetings,” City of Philadelphia, accessed August 17, 2020, <https://www.phila.gov/departments/police-advisory-commission/commission-meetings/>.

Policy analysis

As a result of the PAC's 2017 shift toward reviewing department policies, policy-related reporting constitutes the bulk of the PAC's workload. The commission has issued several reports and anticipates conducting further policy-related work as it continues to increase staff capacity with the additional funds appropriated to it following the May 2018 charter amendment.

The PAC's policy reports are sent to the police commissioner, who is required to respond to the commission's recommendations in writing within 30 days. Each report and the PPD's responses are subsequently posted on the PAC's website.

In July 2018, the PAC published a review of PPD's body-worn camera (BWC) pilot program.¹²⁰ To conduct the review, the commission reviewed the PPD's BWC policy; met with PPD executives leading the BWC initiative, representatives from the Philadelphia District Attorney's Office, and local and national advocates focusing on BWCs; interviewed officers involved in BWC programs in other law enforcement agencies around the country; reviewed BWC policies from 10 different jurisdictions; and studied existing literature on BWCs.¹²¹

The PAC assessed the PPD's BWC program along various criteria, including its stated purpose and goals, implications on legitimacy and procedural justice, effects on accountability and oversight, concerns about privacy and potential adoption of facial recognition technology, camera placement, and communication regarding expansions to the program. The report's discussions of these criteria included references to the PPD's current BWC practices and findings from the several sources of information used for the review. The report resulted in 10 recommended changes to the PPD's BWC policy, including new language for the BWC policy and actionable steps the department can take to address the identified concerns.¹²² Among the PAC's recommendations were prohibiting officers from viewing BWC footage prior to giving statements, extending the length of the pre-event recording period, guarding against threats to civil liberties created by facial recognition and biometric technologies, and communicating the status of the BWC program rollout to the community.

120. *Philadelphia Police Department Body-Worn Camera: Review of Policy, Practice, and Custom* (Philadelphia: Police Advisory Commission, 2018), <https://www.phila.gov/media/20190208143036/PAC-report-on-body-cameras.pdf>.

121. *Philadelphia Police Department Body-Worn Camera*, 3 (see note 119).

122. *Philadelphia Police Department Body-Worn Camera*, 6–10 (see note 119).

In its response, the PPD agreed with two recommendations, partially agreed with three recommendations, and disagreed with five recommendations.¹²³

In a separate report, the PAC addressed a high-profile incident in which two Black men waiting in a Starbucks were arrested for defiant trespass.¹²⁴ One of the men asked to use the restroom and was told it was for paying customers only. Shortly after, the two men were asked to either make a purchase or leave the store.¹²⁵ After they declined to leave, the store manager called the police, and the men were subsequently arrested.¹²⁶ Bystander footage of the incident went viral and set off a nationwide discussion over race, space, and policing in 2018.¹²⁷

The report contextualized the matter by providing the PPD's official description of the incident.¹²⁸ The PAC conducted interviews with the involved officers with FOP representatives present and asked how the element of race influenced the outcome of the encounter.¹²⁹ One witness at the Starbucks was also interviewed. Media reports of the incident, video footage from the store, and insight regarding the encounter provided by veteran police officers were also reviewed.¹³⁰

The report included a review of contemporary racism in the United States and the role that systematic racism plays in police-civilian encounters.¹³¹ The PAC report asserted that it was “unacceptable,” in a context where poverty, police contacts, and outcomes in the criminal justice system disproportionately affect minorities, that officers “are not acutely aware of race, racism,

123. *Philadelphia Police Department Body-Worn Camera*, 33–37 (see note 119).

124. *Evaluation of the April 13, 2018 Defiant Trespass Arrest at a Philadelphia Starbucks* (Philadelphia: Police Advisory Commission, 2018), 2, <https://www.phila.gov/media/20190208142708/PAC-report-in-response-to-the-Starbucks-incident.pdf>.

125. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 2 (see note 123).

126. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 2 (see note 123).

127. Elizabeth Dias, John Eligon, and Rocharad A. Oppel, Jr., “Philadelphia Starbucks Arrests, Outrageous to Some, Are Everyday Life for Others,” *The New York Times*, April 17, 2018. <https://www.nytimes.com/2018/04/17/us/starbucks-arrest-philadelphia.html>; Radley Balko, “What White People Can Learn from the Starbucks Arrests,” *The Washington Post*, April 17, 2018, https://www.washingtonpost.com/news/the-watch/wp/2018/04/17/what-white-people-can-learn-from-the-starbucks-arrests/?utm_term=.246c9b4e613d; *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 2 (see note 130).

128. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 3 (see note 123).

129. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 4 (see note 123).

130. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 6 (see note 123).

131. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 10 (see note 123).

and the police's role in perpetuating those issues."¹³² The report similarly addressed the role of police leadership in officer decision-making with regard to race¹³³ and the inadequacies of de-escalation in addressing contacts where race is a sensitive issue.¹³⁴

The commission's report included several recommendations for training and PPD's policies, procedures, and customs. Among these were incorporating a structural competency framework into PPD's anti-racism training,¹³⁵ using local testimonials and research-based evidence in its trainings,¹³⁶ developing role-playing and scenario-based training exercises,¹³⁷ developing a clear and consistent strategy for communicating how 911 should be used,¹³⁸ and evaluating its field training officer program.¹³⁹

The PPD said it would consider the four anti-racism training-related proposals.¹⁴⁰ With regard to the six policy, procedure, or custom-related recommendations, the PPD largely disagreed with the PAC and refuted the premises under which they were issued. In its response, the police commissioner stated, "The PPD cannot agree with the statement that racism has a profound effect on what drives citizen and police contact. Rather, we believe the profound effect on what drives citizen and police contact lies in criminal conduct and victimization."¹⁴¹ A local newspaper criticized the PPD's "narrow and technical view" of the incident and said the city council should

132. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 10 (see note 123).

133. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 11 (see note 123).

134. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 12 (see note 123).

135. A structural competency framework includes "understanding the effects of oppression and structural-level disparities on the psychological well-being of marginalized groups and individuals." Alisha Ali and Corianna E. Sichel, "Structural Competency as a Framework for Training in Counseling Psychology," *The Counseling Psychologist* 42, no. 7 (2014), <https://journals.sagepub.com/doi/full/10.1177/0011000014550320>; *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 15 (see note 123).

136. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 16 (see note 123).

137. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 16–17 (see note 123).

138. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 19 (see note 123).

139. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 23 (see note 123).

140. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 27 (see note 123).

141. *Evaluation of the April 13, 2018 Defiant Trespass Arrest*, 26 (see note 123).

ensure the PPD’s next budget includes an allocation of funds to implement the PAC’s recommendations—“otherwise the investment in the PAC is nothing more than paying for the production of a fancy report.”¹⁴²

The PAC engaged in data and policy analyses under its previous executive order as well. In 2004, the PAC partnered with the PPD, behavioral health agencies, and community groups to establish a comprehensive crisis intervention training (CIT) program to provide the PPD with guidance on interactions with people with mental illnesses.¹⁴³

In its 2005–2008 Annual Report, the PAC analyzed disaggregated litigation data relating to police misconduct for the years 2004–2008.¹⁴⁴ The PAC looked at both the number of claims for various categories of cases—such as assault/battery claims, excessive force claims, and false arrest claims—as well as the total dollar amounts of legal settlements for each category per year.¹⁴⁵

Community outreach

The PAC holds public meetings each month at its office, community centers, churches, and other locations throughout the city. It maintains a public calendar of its meetings, PPD community district meetings, town hall meetings, and other relevant outreach events to keep the public informed. The commission’s meeting agendas and minutes are posted on its website.¹⁴⁶

142. The Inquirer Editorial Board, “Starbucks Report Says Racism Affects Policing. Police Disagree,” *The Philadelphia Inquirer*, October 18, 2018, <http://www2.philly.com/philly/opinion/editorials/starbucks-report-says-police-need-training-in-anti-bias-police-disagree-editorial-20181018.html>.

143. Kelvyn Anderson, “Crisis Intervention Training: Philadelphia,” *NACOLE Review*, Winter 2008, 4, <https://d3n8a8pro7vhmx.cloudfront.net/nacole/pages/114/attachments/original/1458133084/nacolereview2008winter.pdf?1458133084>.

144. 2005–2008 Annual Report, 20–21 (see note 54).

145. 2005–2008 Annual Report, 20–21 (see note 54).

146. “Police Advisory Commission Meetings” (see note 118).

The PAC maintains an active presence on social media, including Facebook¹⁴⁷ and Twitter,¹⁴⁸ where it posts information relating to its and the PPD's work that is of community interest. The PAC also maintains a YouTube channel¹⁴⁹ where video recordings of its public meetings are posted.

147. Philadelphia Police Advisory Commission's Facebook page, accessed August 17, 2020, <https://www.facebook.com/PHLPAC/>.

148. Philadelphia Police Advisory Commission's Twitter page, username @PHLPAC, accessed August 17, 2020, <https://twitter.com/PHLPAC>.

149. Philadelphia Police Advisory Commission's YouTube channel, accessed August 17, 2020, <https://www.youtube.com/channel/UCgalJZX2oyXf6EzcRMB3H-g/featured>.

The wave of high-profile incidents in 2020 between police and community members prompted widespread calls for greater community oversight of law enforcement agencies. **Civilian Oversight of Law Enforcement: Report on the State of the Field and Effective Oversight Practices**, a white paper by the National Association for Civilian Oversight of Law Enforcement, outlines the history of civilian oversight including reference to this case study of the Philadelphia Police Department and eight others.



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