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LOS ANGELES COUNTY

"Enriching lives through effective and caring service"

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February 2, 2022

Tanya Koshy
Deputy Attorney General
Civil Rights Enforcement Section California
Office of the Attorney General
1515 Clay Street, Oakland, CA 94612
Email: Tanya.Koshy@doj.ca.gov

RE: Rulemaking Comments for Revisions to Proposed
Modifications to Chapter 19. Racial and Identity Profiling Act of
2015

Dear Deputy Attorney General Tanya Koshy,

We, the undersigned members from the Ad Hoc Committee on Policing and Human Relations of the Los Angeles County Commission on Human Relations (LACCHR), write to voice our agreement with the proposed modifications to the Racial and Identity Profiling Act of 2015 (RIPA).

The proposed modifications to Article 1. Definitions (namely #1, #13, #19, #21) and Article 5. Technical Specifications and Uniform Reporting Practices (#37) resonate with the LACCHR's commitment to advancing equity in policing practices, policies, and procedures. These proposed modifications are in alignment with various recommendations found in the LACCHR's report, [Redefining Policing With Our Community](#), a three-year effort to glean best practices in police-community relations from every corner of Los Angeles County.

RECOMMENDATION 6 – Make information on use-of-force incidents and assault on officer incidents, including all relevant geographic and demographic data, publicly available and accessible; this information should also be reported at public forums such as oversight meetings, town halls, etc.

RECOMMENDATION 10 – LA County Board of Supervisors should mandate and resource production of an annual report documenting and assessing policing and human relations in LA County, including monitoring the progress of implementation of this report’s recommendations in consultation with the LA County Office of the Inspector General and related bodies; this report should involve all local law enforcement jurisdictions and incorporate a legislative analysis as well as highlight data on use-of-force incidents and police stops.

RECOMMENDATION 16 – Publicly demonstrate the use of information collected through the Racial and Identity Profiling Act by advocating for state resources to be allocated to law enforcement agencies and neutral third-party facilitators to increase data analytics capacity and public dissemination.

RECOMMENDATION 20 – Mandate the training of police officers on trauma-informed approaches for interactions with the public.

The LACCHR commends the DOJ for proposing modifications to RIPA that attempt to make policing more trauma-informed via the use of gender-neutral language (Article 1, #1). This change will surely encourage the field of policing to adopt more inclusive language use and metrics to not misgender and/or misclassify people they interact with. Furthermore, the proposed modification to “Actions Taken by Officer During Stop” distinguishing between force-related and non-force related actions will build greater transparency regarding what occurs in the field during stops (Article 1, #13). Moreover, the proposed modifications related to firearms (Article 1, #19 and #21) align with national shifts towards “point and report” and “unholstering” policies that classify these actions as force-related and mandate their reporting. Lastly, the proposed modifications to the confidential disclosure of stop data (Article 5, #37) advance a culture of transparency and accountability by creating clear pathways for researchers outside of the law enforcement field to access and analyze policing data.

If you have any questions, and/or if you would like to schedule a meeting to further discuss these matters, please contact our senior staff, Pierre Ivan Arreola (parreola@hrc.lacounty.gov) and Joshua Parr (jparr@hrc.lacounty.gov).

Office of the Attorney General
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February 2, 2022

Sincerely,

A handwritten signature in blue ink, appearing to read 'Isabelle Gunning', with a large, sweeping flourish at the end.

Professor Isabelle Gunning, Esq.
Commissioner, Supervisorial District 3
Chair, Ad Hoc Committee on Policing and Human Relations
Los Angeles County Commission on Human Relations

A handwritten signature in black ink, appearing to read 'Robin A. Toma', with a large, sweeping flourish at the end.

Robin Toma
Executive Director
Los Angeles County Commission on Human Relations
Executive Office of the Board of Supervisors